

# TSD File Inventory Index

Date: July 20, 2006

Initial: CMH/eneled

Facility Name: <u>Dave Cooper (Spicer Transmission Division - Co. Field - Site)</u>		
Facility Identification Number: <u>OHIO 052 813 540</u>		
<b>A.1 General Correspondence</b>		<b>B.2 Permit Docket (B.1.2)</b>
<b>A.2 Part A / Interim Status</b>	✓	.1 Correspondence
.1 Correspondence	✓	.2 All Other Permitting Documents (Not Part of the ARA)
.2 Notification and Acknowledgment	✓	<b>C.1 Compliance - (Inspection Reports)</b>
.3 Part A Application and Amendments	✓	<b>C.2 Compliance/Enforcement</b>
.4 Financial Insurance (Sudden, Non Sudden)	✓	.1 Land Disposal Restriction Notifications
.5 Change Under Interim Status Requests	✓	.2 Import/Export Notifications
.6 Annual and Biennial Reports		<b>C.3 FOIA Exemptions - Non-Releasable Documents</b>
<b>A.3 Groundwater Monitoring</b>		<b>D.1 Corrective Action/Facility Assessment</b>
.1 Correspondence		.1 RFA Correspondence
.2 <sup>nd</sup> Reports		.2 Background Reports, Supporting Docs and Studies
<b>A.4 Closure/Post Closure</b>		.3 State Prelim. Investigation Memos
.1 Correspondence		.4 RFA Reports
.2 Closure/Post Closure Plans, Certificates, etc		<b>D. 2 Corrective Action/Facility Investigation</b>
<b>A.5 Ambient Air Monitoring</b>		.1 RFI Correspondence
.1 Correspondence		.2 RFI Workplan
.2 Reports		.3 RFI Program Reports and Oversight
<b>B.1 Administrative Record</b>		.4 RFI Draft /Final Report

Total - 1

.5 RFI QAPP		.6 CMI QAPP	
.6 RFI QAPP Correspondence		.7 Lab Data, Soil-Sampling/Groundwater	
.7 Lab Data, Soil-Sampling/Groundwater		.8 Progress Reports	
.8 RFI Progress Reports		<b>D.5 Corrective Action/Enforcement</b>	
.9 Interim Measures Correspondence		.1 Administrative Record 3008(h) Order	
.10 Interim Measures Workplan and Reports		.2 Other Non-AR Documents	
<b>D.3 Corrective Action/Remediation Study</b>		<b>E. Boilers and Industrial Furnaces (BIF)</b>	
.1 CMS Correspondence		.1 Correspondence	
.2 Interim Measures		.2 Reports	
.3 CMS Workplan		<b>F.1 Imagery/Special Studies</b> (Videos, Photos, Disks, Maps, Blueprints, Drawings, and Other Not Oversized Special Materials.)	
.4 CMS Draft/Final Report		<b>G.1 Risk Assessment</b>	
.5 Stabilization		.1 Human/Ecological Assessment ...	
.6 CMS Progress Reports		.2 Compliance and Enforcement ...	
.7 Lab Data, Soil-Sampling/Groundwater		.3 Enforcement Confidential	
<b>D.4 Corrective Action Remediation Implementation</b>		.4 Ecological - Administrative Record	
.1 CMI Correspondence		.5 Permitting	
.2 CMI Workplan		.6 Corrective Action/Remediation Study ...	
.3 CMI Program Reports and Oversight		.7 Corrective Action Remediation Implementation ...	
.4 CMI Draft/Final Reports		.8 Endangered Species Act	
.5 CMI QAPP		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: *Documents do not justify individual folders per schedule.*

**A.2 Part A/  
Interim Status**



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

George V. Voinovich  
Governor

Donald R. Schregardus  
Director

May 6, 1992

Dana Corporation Spicer Transmission  
Attn: Robert J. Ruester  
P.O. Box 986  
4080 Bennett Road  
Toledo, OH 43696

RE: EPA ID#: OHD052813540

In response to your request of April 22, 1992 the  
following information has been updated:

Address has been updated to 4080 Bennett Road in Toledo.

Generator Status: small quantity

Contact: Robert J. Ruester (419)470-8211

If you have any questions, please contact Beth Harris at  
(614)644-2977.

Sincerely,

Thomas E. Crepeau, Manager  
Data Management Section  
Division of Hazardous Waste Management

TEC/bah

cc: U.S. EPA, Region V







UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION V

111 West Jackson Blvd.  
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:  
RCRA ACTIVITIES

MAY 28 1982

Paul Motyl, Plant Manager  
Dana Corp. Spicer Transmission Div.  
Post Office Box 986  
Toledo, Ohio 43696

RE: Interim Status Acknowledgement USEPA ID No. OHD052813540  
FACILITY NAME: Dana Corp. Spicer Transmission Div.

Dear Mr. Motyl:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Karl J. Klepitsch, Jr.", is written over the typed name.

Karl J. Klepitsch, Jr., Chief  
Waste Management Branch

Enclosure

cc: R. Eskra, Executive Vice President &  
General Manager

Handwritten initials "JL" and a date stamp "5/25/82" are visible in the bottom right corner of the page.

FACILITY NAME

EPA ID NUMBER

DANA CORP SPICER TRANSMISSION DIV

OHD052813540

FACILITY OPERATOR

DANA CORP SPICER TRANSMISSION DIV

FACILITY OWNER

DANA CORP SPICER TRANSMISSION DIV

FACILITY LOCATION

4100 BENNETT RD  
TOLEDO

OH 43696

PROCESS CODE

DESIGN CAPACITY

UNIT OF MEASURE

T01

360000.00000

U

S04

12800.00000

G

S01

520.00000

G

-----\*\*KEY\*\*-----

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE	* UNIT OF MEASURE	CODE
STORAGE:				
CONTAINER	S01	G OR L	* GALLONS	G
TANK	S02	G OR L	* LITERS	L
WASTE PILE	S03	Y OR C	* CUBIC YARDS	Y
SURFACE IMPOUNDMENT	S04	G OR L	* CUBIC METERS	C
DISPOSAL:			* GALLONS PER DAY	U
			* LITERS PER DAY	V
			* TONS PER HOUR	D
			* METRIC TONS\HOUR	W
INJECTION WELL	D79	G,L,U, OR V	* GALLONS\HOUR	E
LANDFILL	D80	A OR F	* LITERS\HOUR	H
LAND APPLICATION	D81	B OR G	* ACRE-FEET	A
OCEAN DISPOSAL	D82	U OR V	* HECTARE-METER	F
SURFACE IMPOUNDMENT	D83	G OR L	* ACRES	B
TREATMENT:			* HECTARES	Q
			* POUNDS\HOUR	J
TANK	T01	U OR V	* KILOGRAMS\HOUR	R
SURFACE IMPOUNDMENT	T02	U OR V	* TONS PER DAY	N
INCINERATOR	T03	D,W,E, OR H	* METRIC TONS\DAY	S
OTHER	T04	J,R,N,S,U,V	*	



ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY  
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• OHD052813540

REACKNOWLEDGEMENT

DANA CORP SPICER TRANSMISSION DIV  
P O BOX 986  
TOLEDO

OH 43696

INSTALLATION ADDRESS

4100 BENNETT RD  
TOLEDO

OH 43696

09/29/81



U.S. ENVIRONMENTAL PROTECTION AGENCY  
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

000049 JUL 25 80

**INSTRUCTIONS:** If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

## FOR OFFICIAL USE ONLY

## COMMENTS

INSTALLATION'S EPA I.D. NUMBER										APPROVED		DATE RECEIVED (yr., mo., & day)									
F	D	N	D	0	5	2	8	1	3	5	4	0	2	1	A	8	0	0	7	2	5

## I. NAME OF INSTALLATION

DANA CORP SPICER TRANSMISSION DIV.

## II. INSTALLATION MAILING ADDRESS

## STREET OR P.O. BOX

3 PO BOX 986

## CITY OR TOWN

4 TOLEDO

## ST.

## ZIP CODE

OH 43696

## III. LOCATION OF INSTALLATION

## STREET OR ROUTE NUMBER

5 4100 BENETT RD

## CITY OR TOWN

6 TOLEDO

## ST.

## ZIP CODE

OH 43696

## IV. INSTALLATION CONTACT

## NAME AND TITLE (last, first, &amp; job title)

2 PAUL MOTYL PLANT MANAGER

## PHONE NO. (area code &amp; no.)

419-476-8200

## V. OWNERSHIP

## A. NAME OF INSTALLATION'S LEGAL OWNER

8 DANA CORP SPICER TRANSMISSION DIV

## B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL  
M = NON-FEDERAL

M

## VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

## VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

## VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

DND052813540

## IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.



I.D. -- FOR OFFICIAL USE ONLY									
5	W	0	N	D	0	5	2	8	1
1	2	3	4	5	6	7	8	9	10
11	12	13	14	15	16	17	18	19	20

# IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

**A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 1 23 - 26	2 F 0 0 2 23 - 26	3 F 0 1 0 23 - 26	4 F 0 1 1 23 - 26	5 F 0 1 2 23 - 26	6  23 - 26
7  23 - 26	8  23 - 26	9  23 - 26	10  23 - 26	11  23 - 26	12  23 - 26

**B. HAZARDOUS WASTES FROM SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13  23 - 26	14  23 - 26	15  23 - 26	16  23 - 26	17  23 - 26	18  23 - 26
19  23 - 26	20  23 - 26	21  23 - 26	22  23 - 26	23  23 - 26	24  23 - 26
25  23 - 26	26  23 - 26	27  23 - 26	28  23 - 26	29  23 - 26	30  23 - 26

**C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U 1 8 8 23 - 26	32 U 2 1 9 23 - 26	33 U 2 2 6 23 - 26	34  23 - 26	35  23 - 26	36  23 - 26
37  23 - 26	38  23 - 26	39  23 - 26	40  23 - 26	41  23 - 26	42  23 - 26
43  23 - 26	44  23 - 26	45  23 - 26	46  23 - 26	47  23 - 26	48  23 - 26

**D. LISTED INFECTIOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49  23 - 26	50  23 - 26	51  23 - 26	52  23 - 26	53  23 - 26	54  23 - 26
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**E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES.** Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE  
(D001)

☐ 2. CORROSIVE  
(D002)

☐ 3. REACTIVE  
(D003)

☐ 4. TOXIC  
(D000)

## X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (type or print)

DATE SIGNED

*Paul Matyl*

PLANT MANAGER

7/21/80

EPA Form 8700-12 (6-80) REVERSE



**SPICER TRANSMISSION DIVISION**

May 24, 1991

U.S. Environmental Protection Agency Region V  
RCRA Activities  
230 South Dearborn Street  
Chicago, Illinois 60604

**RECEIVED**  
MAY 28 1991

Attention: Generator ID Section

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

Dear Sir or Madam:

The purpose of this letter is to request a change in hazardous waste activity status for my facility.

The Dana Corporation, Spicer Transmission Plant located at 4080 Bennett Road, Suite E, Toledo, Ohio has undergone many changes in the past few years. All Dana industrial activities have been moved off site to other Dana divisions. And the property has been sold to the Willis Day Company for warehousing. The only Dana operation that remains at the site is a small engineering office and test center.

As a result, we are requesting that our status as a hazardous waste TSD (treatment, storage and disposal) facility be changed to that of small quantity generator. Our current EPA identification number is OHD052813540.

Our site has already been visited by a representative of the Ohio EPA. A letter documenting that visit and directing us to write this letter is attached for your review.

If you have any questions, please do not hesitate to call. We await your decision and future direction.

Sincerely,

Robert Ruester  
Facilities Coordinator

RR:dn

enc.



State of Ohio Environmental Protection Agency

**Northwest District Office**

1035 Devlac Grove Drive

Bowling Green, Ohio 43402-4598

(419) 352-8461 FAX (419) 352-8468

Richard F. Celeste

Governor

Re: Dana Corporation  
Spicer Transmission Division  
OHD052813540  
Hazardous Waste  
Lucas County

September 6, 1990

Ms. Judi Copeland  
Dana Corporation  
8000 Yankee Road  
Ottawa Lake, Michigan 49267

Dear Ms. Copeland:

I was at the former Dana Corporation-Spicer Transmission plant at 4100 Bennett Road in Toledo, Ohio, on July 18, 1990. The writer met with yourself, Mr. Robert Ruester, Mr. Willis Day IV, and Mr. James Clegg. It is my understanding that at this time the entire property is owned by Willis Day Business Center. The Dana Corporation-Spicer Transmission Plant which filed a Part A permit to store hazardous waste on-site ceased operations at this location in January of 1989. There has not been any hazardous waste generation at this location, either by Dana or Willis Day, since that time.

I was informed during our meeting that Dana filed the Part A permit as a "precautionary measure only" and that no hazardous waste remained on-site, either in the permitted storage area or elsewhere in the plant, for greater than ninety (90) days. I was also informed that in either 1987 or 1988 the U.S. Environmental Protection Agency sent Dana a letter stating that the facility's status was being changed from that of a treatment, storage, and disposal facility (TSD) to a generator only.

During a tour of the facility, I was shown the old permitted storage area. It was part of the former manufacturing plant which is now used by Willis Day as warehouse space.

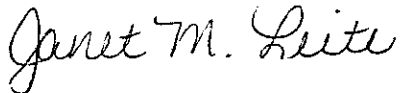
5-10  
1-95

Ms. Judi Copeland  
September 6, 1990  
Page Two

In order to remove Dana Corporation-Spicer Transmission Division from the U.S. EPA's generator and TSD universe, Dana should notify the U.S. EPA Region V, RCRA Activities, 230 South Dearborn, Chicago, Illinois, and request that the generator ID number for this facility be made inactive. Include an explanation of the current status of the site. A copy of this correspondence should be included.

If you have any questions concerning this matter, please contact me at (419) 352-8461.

Sincerely,



Janet M. Leite  
Division of Solid and  
Hazardous Waste Management

/dlh

cc: Carolyn Reiersen, DSHWM, CO  
Cindy Lohrbach, DSHWM, NWDO  
Mr. Robert Ruester, Dana Corporation  
Mr. Willis Day IV, Willis Day Business Center  
Mr. James A. Clegg, Willis Day Business Center  
NWDO file



DEC 23 1985

5HS-JCK-13

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Gregory Schafer  
Maintenance Planner/Coordinator  
Dana Corp. Spicer Transmission Division  
P.O. Box 986  
Toledo, Ohio 43696

Re: Withdrawal of Part A Application  
(Storage Fewer than 90 days)  
Corrective Action Requirements,  
Hazardous and Solid Waste  
Amendments of 1984  
Dana Corp. Spicer Transmission Division  
OHD 052 813 540

Dear Mr. Schafer:

This is to acknowledge receipt of your October 1, 1985, letter requesting the withdrawal of the Part A Hazardous Waste Permit Application for the referenced facility. The request stated the facility would like to be considered a generator of hazardous waste only, and accumulate those wastes on-site for fewer than 90 days according to 40 CFR 262.34 (enclosed).

Based on the Agency's information, however, the facility has stored hazardous wastes for longer than 90 days at some time since November 19, 1980. Therefore, the facility is subject to the closure requirements in 40 CFR 265 Subpart G and subject to the Hazardous and Solid Waste Amendments of 1984. Your obligations under 40 CFR Subpart G may be satisfied by completing the enclosed "request for change in status," having it signed by an appropriate individual per 40 CFR 270.11 (enclosed).

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the Amendments) were enacted to amend the Resource Conservation and Recovery Act (RCRA). Under Section 206 and Section 233 (copies enclosed) of the Amendments, all facilities "seeking a permit" (taken to mean interim status facilities) must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2. Under the Cooperative Agreement with the United States Environmental Protection Agency (U.S. EPA), the State has agreed to implement the corrective action requirements of the Amendments prior to the State getting formally authorized for the provisions of the Amendments.

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Eric J. Schmidt  
Senior Environmental Engineer  
Georgia-Pacific Corporation  
133 Peachtree Street, N.E.  
P.O. Box 105605  
Atlanta, Georgia 30348

Re: Withdrawal of Part A Application  
(Storage Fewer than 90 days)  
Corrective Action Requirements,  
Hazardous and Solid Waste  
Amendments of 1984  
Dana Corp. Spicer Transmission Division  
OHD 052 813 540

Dear Mr. Schmidt:

This is to acknowledge receipt of your October 1, 1985, letter requesting the withdrawal of the Part A Hazardous Waste Permit Application for the referenced facility. The request stated the facility would like to be considered a generator of hazardous waste only, and accumulate those wastes on-site for fewer than 90 days according to 40 CFR 262.34 (enclosed).

Based on the Agency's information, however, the facility has stored hazardous wastes for longer than 90 days at some time since November 19, 1980. Therefore, the facility is subject to the closure requirements in 40 CFR 265 Subpart G and subject to the Hazardous and Solid Waste Amendments of 1984. Your obligations under 40 CFR Subpart G may be satisfied by completing the enclosed "request for change in status," having it signed by an appropriate individual per 40 CFR 270.11 (enclosed).

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the Amendments) were enacted to amend the Resource Conservation and Recovery Act (RCRA). Under Section 206 and Section 233 (copies enclosed) of the Amendments, all facilities "seeking a permit" (taken to mean interim status facilities) must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2. Under the Cooperative Agreement with the United States Environmental Protection Agency (U.S. EPA), the State has agreed to implement the corrective action requirements of the Amendments prior to the State getting formally authorized for the provisions of the Amendments.



Consequently, we must determine whether such releases have ever occurred at the facility site. If they have, we must ensure that corrective actions either have been taken, or will be taken, pursuant to a decision on your closure plan. An important part of our determination includes your willingness (or unwillingness) to sign the enclosed certification statement. Please read it carefully, and either sign it and return it, or return it to us unsigned with a cover letter of explanation, and within three weeks of the date of this letter submitting it to the following address:

RCRA Activities  
U.S. EPA, Region V  
P.O. Box A3587  
Chicago, Illinois 60690-3587

After our receipt of the properly executed change in status certification and corrective action certification, we will publicly notice your change in status and any tentative decision we make regarding releases of hazardous waste or hazardous constituents to the environment will be included in the public notice inviting public comment on our tentative decision. Public notice will be in a newspaper of general circulation in the area of the facility. Upon completion of the public notice period we will notify you in writing of your regulatory status. This may eliminate the need for a hazardous waste permit at your facility.

Please contact Mr. Bruce Sypniewski of my staff at (312) 886-6189, if you have any questions.

Sincerely,

Edith M. Ardiente, P.E.  
Chief, Technical Programs Section

- Enclosures (1) 40 CFR 262.34  
(2) Request for change in status  
(3) 40 CFR 270.11  
(4) HSWA Section 206 & 233  
(5) Certification on Potential Releases

cc: Tom Carlisle, OEPA  
Dave Ferguson, OEPA-NWDO

5HS-JCK-13:B.Sypniewski:GGW:12-4-85:

	TYP.	AMT.	IN	IN	IN	IN	IN	IN	IN	IN
INT.	12/3/85	12/11/85								
DATE	12/3/85	12/11/85								

REV. 10/11/85

12/19/85

\*NOTE - this was not sent back to the OH unit until 12/23/85



**SPICER TRANSMISSION DIVISION**

November 7, 1985

Mr. Bruce Syniewski  
RCRA Activities  
Part B Application  
U. S. EPA Permit Application  
P.O. Box A3587  
Chicago, IL 60690-3587

**RECEIVED**

**DEC 12 1985**

**SOLID WASTE BRANCH  
U.S. EPA, REGION V**

Dear Mr. Syniewski;

*OHDO528/3540 C TSD PA*

The following letter, which was previously sent on November 4, is being resent to provide the map of sample locations which we neglected to include.

In response to our phone conversation of October 22, 1985, I am sending you a copy of locations of samples used to withdraw our part B application. I would like to thank you and David Ferguson for your time and assistance in this withdrawal.

Sincerely yours,

Gregory D. Schafer  
Maintenance Planner/Coordinator

CC: David Ferguson, O.E.P.A.  
Dean Couch  
Jim Hyland  
Terry Drennan

**COPY**

GS/ic





**SPICER TRANSMISSION DIVISION**

November 4, 1985

Mr. Bruce Syniewski  
RCRA Activities  
Part B Application  
U. S. EPA Permit Application  
P.O. Box A3587  
Chicago, IL 60690-3587

**RECEIVED**

**NOV 08 1985**

**SWB - AIS  
U.S. EPA, REGION V**

Dear Mr. Syniewski:

In response to our phone conversation of October 22, 1985, I am sending you a copy of locations of samples used to withdraw our part B application. I would like to thank you and David Ferguson for your time and assistance in this withdrawal.

Sincerely yours,

*Gregory D. Schafer/sc*

Gregory D. Schafer  
Maintenance Planner/Coordinator

CC: David Ferguson, O.E.P.A.  
Dean Couch  
Jim Hyland  
Terry Drennan

GS/ic





SPICER TRANSMISSION DIVISION

RECEIVED

OCT 07 1985

October 3, 1985

SWB - AIS  
U.S. EPA, REGION V

RECEIVED

OCT 07 1985

SOLID WASTE BRANCH  
U.S. EPA, REGION V

U. S. Environmental Protection Agency  
230 South Dearborn Avenue  
Chicago, IL 60604

Mrs. Judy Greenburg:  
Authorization and Administration

OH DO 508135 PD (C) TSD PA

Regarding Dana Corporation, Spicer Transmission Divisions' request for withdrawal of the T.S.D. Permit (E.P.A. I.D. #OH0 052 813 840) for this plant. We request that we still be classified as a small quantity generator and keep our E.P.A. I.D.

All of the required analyses have been made and we feel that this plant does not fall under the T.S.D. definition.

Enclosed are lab reports which David L. Ferguson, Ohio E.P.A. and Bruce Syniewski, Fed. E.P.A. requested.

If you have any questions or need clarification, David Ferguson of the Ohio E.P.A. may be able to help or please contact me at (419) 470-8423.

Greg Schafer  
Maintenance Planner/Coordinator

CC: David L. Ferguson, O.E.P.A.  
Bruce Syniewski, Fed. E.P.A.  
Dean Couch  
Rudy Eskra  
Terry Drennan  
Jerry Hunt  
Jim Hyland

GS/ic

Dana Corporation - Spicer  
P.O. Box 986  
Toledo, OH 43696

Attn: G. Schafer



lab no. 85-3772

lot no. \_\_\_\_\_

p.o. no. \_\_\_\_\_

Page 1 of 2

biological & environmental control laboratories, inc.  
615 front street toledo, ohio 43605 phone (419) 693-5307

sample  
description:

#3 Leach Bed Solids

analysis:

Extraction Procedure Toxicity Testing

procedure:

A composite sample of 108.89 grams was filtered resulting in a 43.42 gram filter cake and 54 ml of filtrate. The filter cake was extracted as outlined in "Test Methods for Evaluating Solid Wastes Physical/Chemical Methods". The sample was extracted in 695 ml of distilled water and a total of 174 ml of 0.5 N acetic acid was needed in order to maintain a specified pH of  $5.0 \pm 0.2$ . The extract was diluted with 0 additional ml of water and filtered through a 0.45 um pore size membrane filter. The extract and 54 ml of filtrate from the composite sample were combined and analyzed according to the above reference.

1,1,1-Trichloroethane - A portion of the sample was extracted in carbon disulfide and analyzed by gas chromatography for 1,1,1-Trichloroethane.

Oil, Solids & Water - A weighed portion of the sample was distilled in boiling toluene using a Soxhlet extractor equipped with a distilling receiver. Oil was measured by weighing the toluene soluble residue, water was determined as volume in the receiver and solids by difference.

The remainder of the parameters were determined as outlined in US EPA "Test Methods for Evaluating Solid Waste Physical/Chemical Methods", SW-846, July 1982, 2nd Edition.

results:

<u>Test</u>	<u>Allowable Maximum</u>	<u>Measured Concentration</u>
Arsenic	5.0	less than 0.2 mg/L
Barium	100	1.3 mg/L
Cadmium	1.0	less than 0.05 mg/L
Chromium	5.0	less than 0.1 mg/L
Lead	5.0	less than 0.1 mg/L
Mercury	0.2	less than 0.005 mg/L
Selenium	1.0	less than 0.05 mg/L
Silver	5.0	less than 0.05 mg/L
Total Cyanide		4.1 ppm
Total Solids		19.6%

8/20/85

CLL/DDO/JH

date completed

tech.

approved by

*J E Huffman*



Dana Corporation - Spicer  
P.O. Box 986  
Toledo, OH 43696

Attn: G. Schafer



lab no. 85-3772

lot no. \_\_\_\_\_

p.o. no. \_\_\_\_\_

Page 2 of 2

biological & environmental control laboratories, inc.  
615 front street toledo, ohio 43605 phone (419) 693-5307

sample  
description:

#3 Leach Bed Solids

analysis:

Extraction Procedure Toxicity Testing

<u>Test</u>	<u>Allowable Maximum</u>	<u>Measured Concentration</u>
pH		9.78
Phenols as $C_6H_5OH$		1.7 ppm
Total Sulfide		254,000 mg/L
Flash Point		greater than 180°F
1,1,1-Trichloroethane		less than 0.01%
Density		1.06
Water Content		10.5%
Solids		79.1%
Oil		10.4%

date completed 8/20/85 tech. CLL/DDO/JH approved by JE Huffman

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Dana Corporation - Spicer  
P.O. Box 986  
Toledo, OH 43696

Attn: G. Schafer



lab no. 85-3774

lot no. \_\_\_\_\_

p.o. no. \_\_\_\_\_

biological & environmental control laboratories, inc.  
615 front street toledo, ohio 43605 phone (419) 693-5307

sample  
description:

#3 Leach Bed Liquid

procedure:

The sample was analyzed by procedures outlined in US EPA "Test Methods for Evaluating Solid Waste Physical/Chemical Methods" SW-846 July 1982 2nd Edition.

1,1,1 - Trichloroethane - was quantified by direct injection gas chromatography.

results:

Arsenic	less than 0.2 mg/L
Barium	less than 0.5 mg/L
Cadmium	less than 0.05 mg/L
Chromium	less than 0.1 mg/L
Lead	less than 0.1 mg/L
Mercury	less than 0.005 mg/L
Selenium	less than 0.05 mg/L
Silver	less than 0.05 mg/L
Total Cyanide	0.15 mg/L
Total Solids	1300 mg/L
Oil & Grease	12.9 mg/L
pH in S.U.	8.53
Phenols as C <sub>6</sub> H <sub>5</sub> OH	0.12 mg/L
Total Suspended Solids	470 mg/L
Total Sulfide	1.6 mg/L
Flash Point	greater than 180°F
1,1,1 - Trichloroethane	less than 0.01%
Density	1.05
Water Content	100% by B, S & W

date completed 8/16/85 tech. IDO/CLL/JH approved by J E Hoffman

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Dana Corporation - Spicer  
P.O. Box 986  
Toledo, OH 43696

Attn: G. Schafer



lab no. 85-3773

lot no. \_\_\_\_\_

p.o. no. \_\_\_\_\_

biological & environmental control laboratories, inc.  
615 front street toledo, ohio 43605 phone (419) 693-5307

sample  
description:

#2 Leach Bed Liquid

procedure:

The sample was analyzed by procedures outlined in US EPA "Test Methods for Evaluating Solid Waste Physical/Chemical Methods" SW-846 July 1982 2nd Edition.

1,1,1 - Trichloroethane - was quantified by direct injection gas chromatography.

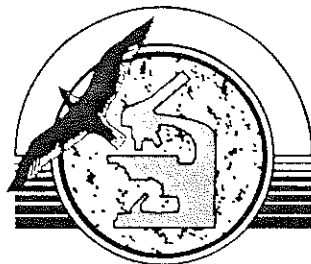
results:

Arsenic	less than 0.2 mg/L
Barium	less than 0.5 mg/L
Cadmium	less than 0.05 mg/L
Chromium	less than 0.1 mg/L
Lead	less than 0.1 mg/L
Mercury	less than 0.005 mg/L
Selenium	less than 0.05 mg/L
Silver	less than 0.05 mg/L
Total Cyanide	0.28 mg/L
Total Solids	810 mg/L
Oil & Grease	32.6 mg/L
pH in S.U.	8.42
Phenols as C <sub>6</sub> H <sub>5</sub> OH	0.18 mg/L
Total Suspended Solids	17 mg/L
Total Sulfide	1.2 mg/L
Flash Point	greater than 180°F
1,1,1 - Trichloroethane	less than 0.01%
Density	1.06
Water Content	100% by B, S & W

date completed 8/16/85 tech. IDO/CLL/JH approved by J E Huffman

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Dana Corporation - Spicer  
P.O. Box 986  
Toledo, OH 43696



lab no. 85-3771

lot no. \_\_\_\_\_

p.o. no. \_\_\_\_\_

Page 1 of 2

biological & environmental control laboratories, inc.  
615 front street toledo, ohio 43605 phone (419) 693-5307

sample  
description:

#2 Leach Bed Solids

analysis:

Extraction Procedure Toxicity Testing

procedure:

A composite sample of 100.0 grams was filtered and extracted as outlined in Test Methods for Evaluating Solid Wastes Physical/Chemical Methods. The sample was extracted in 1600 ml of distilled water and a total of 400 ml of 0.5 N acetic acid was needed in order to maintain the specified pH of  $5.0 \pm 0.2$ . The extract was diluted with 0 additional ml of water and filtered through a 0.45 um pore size membrane filter. The filtrate was then analyzed according to the above reference.

1,1,1-Trichloroethane - A portion of the sample was extracted in carbon disulfide and analyzed by gas chromatography for 1,1,1-Trichloroethane.

Oil, Solids & Water - A weighed portion of the sample was distilled in boiling toluene using a Soxhlet extractor equipped with a distilling receiver. Oil was measured by weighing the toluene soluble residue, water was determined as volume in the receiver and solids by difference.

The remainder of the parameters were determined as outlined in US EPA "Test Methods for Evaluating Solid Waste Physical/Chemical Methods", SW-846, July 1982, 2nd Edition.

results:

<u>Test</u>	<u>Allowable Maximum</u>	<u>Measured Concentration</u>
Arsenic	5.0	less than 0.2 mg/L
Barium	100	1.2 mg/L
Cadmium	1.0	less than 0.05 mg/L
Chromium	5.0	less than 0.1 mg/L
Lead	5.0	less than 0.1 mg/L
Mercury	0.2	less than 0.005 mg/L
Selenium	1.0	less than 0.05 mg/L
Silver	5.0	less than 0.05 mg/L
Total Cyanide		5.6 ppm
Total Solids		42.0%

date completed 8/20/85 tech. CLL/DDO/JH approved by J E Huffman

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Dana Corporation - Spicer  
P.O. Box 986  
Toledo, OH 43696

Attn: G. Schafer



lab no. 85-3771

lot no. \_\_\_\_\_

p.o. no. \_\_\_\_\_

Page 2 of 2

biological & environmental control laboratories, inc.  
615 front street toledo, ohio 43605 phone (419) 693-5307

sample description: #2 Leach Bed Solids

analysis: Extraction Procedure Toxicity Testing

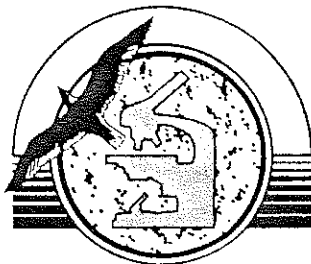
<u>Test</u>	<u>Allowable Maximum</u>	<u>Measured Concentration</u>
pH		8.95
Phenols as $C_6H_5OH$		3.3 ppm
Total Sulfide		46 ppm
Flash Point		greater than 180°F
1,1,1-Trichloroethane		less than 0.01%
Density		1.18
Water Content		29.2%
Solids		47.2%
Oil		23.6%

date completed 8/20/85 tech. CLL/DDO/JH approved by J E Huffman

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Dana Corporation - Spicer  
P.O. Box 986  
Toledo, OH 43696

ttn: G. Schafer



lab no. 85-3775

lot no. \_\_\_\_\_

p.o. no. \_\_\_\_\_

biological & environmental control laboratories, inc.  
615 front street      toledo, ohio 43605      phone (419) 693-5307

sample  
description:

Substance Entering "A" Tank

procedure:

The sample was analyzed by procedures outlined in US EPA "Test Methods for Evaluating Solid Waste Physical/Chemical Methods" SW-846 July 1982 2nd Edition.

1,1,1 - Trichloroethane - was quantified by direct injection gas chromatography.

results:

Arsenic	less than 0.2 mg/L
* Barium	less than 25 mg/L
Cadmium	less than 0.05 mg/L
Chromium	less than 0.12 mg/L
Lead	less than 0.1 mg/L
Mercury	less than 0.005 mg/L
Selenium	less than 0.05 mg/L
Silver	less than 0.05 mg/L
Total Cyanide	0.11 mg/L
Total Solids	670 mg/L
Oil & Grease	715 mg/L
pH in S.U.	7.13
Phenols as C <sub>6</sub> H <sub>5</sub> OH	0.37 mg/L
Total Suspended Solids	240 mg/L
Total Sulfide	2.0 mg/L
Flash Point	greater than 180°F
1,1,1 - Trichloroethane	less than 0.01%
Density	1.04
Water Content	100% by B, S & W

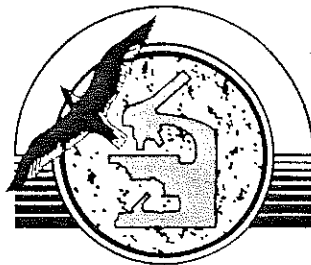
\* NOTE: Due to an interference in the sample, Barium limit is reported at a higher level

date completed 8/16/85 tech. IDO/CLL/JH approved by J E Huffman

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Dana Corporation - Spicer  
P.O. Box 986  
Toledo, OH 43696

attn: G. Schafer



lab no. 85-3776

lot no. \_\_\_\_\_

p.o. no. \_\_\_\_\_

biological & environmental control laboratories, inc.  
615 front street toledo, ohio 43605 phone (419) 693-5307

sample  
description:

Effluent from "C" Tank

procedure:

The sample was analyzed by procedures outlined in US EPA "Test Methods for Evaluating Solid Waste Physical/Chemical Methods" SW-846 July 1982 2nd Edition.

1,1,1 - Trichloroethane - was quantified by direct injection gas chromatography.

results:

Arsenic	less than 0.2 mg/L
Barium	less than 0.5 mg/L
Cadmium	less than 0.01 mg/L
Chromium	less than 0.1 mg/L
Lead	less than 0.1 mg/L
Mercury	less than 0.005 mg/L
Selenium	less than 0.05 mg/L
Silver	less than 0.05 mg/L
Total Cyanide	0.22 mg/L
Total Solids	780 mg/L
Oil & Grease	15.2 mg/L
pH in S.U.	9.75
Phenols as C <sub>6</sub> H <sub>5</sub> OH	0.28 mg/L
Total Suspended Solids	53 mg/L
Total Sulfide	1.2 mg/L
Flash Point	greater than 180°F
1,1,1 - Trichloroethane	less than 0.01%
Density	1.03
Water Content	100% by B, S & W

date completed 8/16/85 tech. CLL/IDO/JH approved by J E Huffman

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Dana Corporation - Spicer  
P.O. Box 986  
Toledo, OH 43696

ttn: G. Schafer



lab no. 85-3777

lot no. \_\_\_\_\_

p.o. no. \_\_\_\_\_

biological & environmental control laboratories, inc.  
615 front street toledo, ohio 43605 phone (419) 693-5307

sample  
description:

Water Discharge to Creek

procedure:

The sample was analyzed by procedures outlined in US EPA "Test Methods for Evaluating Solid Waste Physical/Chemical Methods" SW-846 July 1982 2nd Edition.

1,1,1 - Trichloroethane - was quantified by direct injection gas chromatography.

results:

Arsenic	less than 0.2 mg/L
Barium	less than 0.5 mg/L
Cadmium	less than 0.05 mg/L
Chromium	less than 0.1 mg/L
Lead	less than 0.1 mg/L
Mercury	less than 0.005 mg/L
Selenium	less than 0.05 mg/L
Silver	less than 0.05 mg/L
Total Cyanide	less than 0.1 mg/L
Total Solids	230 mg/L
Oil & Grease	1.2 mg/L
pH in S.U.	8.87
Phenols as $C_6H_5OH$	less than 0.1 mg/L
Total Suspended Solids	9 mg/L
Total Sulfide	0.80 mg/L
Flash Point	greater than 180°F
1,1,1 - Trichloroethane	less than 0.01%
Density	1.06
Water Content	100% by B, S & W

date completed 8/16/85 tech. CLL/IDO/JH approved by J E Huffman

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RECEIVED

7-17-85

## OHIO ENVIRONMENTAL PROTECTION AGENCY

## TELEPHONE MEMORANDUM

WITH Max Schneider DATE 8-16-83  
REPRESENTING Dana Spicer Trans. TIME 10 AM  
PERMIT NO. \_\_\_\_\_ PHONE 470-8200  
OEPA STAFF Dave Ferguson  
SUBJECT Need for ground water monitoring

## NOTES &amp; SUMMARY

## FOLLOW-UP DATE \_\_\_\_\_

When RCRA went into effect Dana filed a protective filing for its WWT ponds. It was tested by Bowser-Morner 11-3-82 & there is no reason for them to be H.W. They use alum & lime.

They have cleared their landfilling of these ponds thru Ben Chambers, DSHWM Supervisor.

They have cut their H.W. streams by using "safety solvents" where they once used chlorinated solvents.

David Ferguson



SPICER TRANSMISSION DIVISION

September 16, 1985

State of Ohio Environmental Protection Agency  
Northwest District Office  
1035 Devlac Grove Dr.  
Bowling Green, Oh 43402

RECEIVED

OCT 1 1985

3 - AIS  
U.S. EPA, REGION V

Mrs. Judy Greenburg;  
Authorization and Administration

Regarding Dana Corporation, Spicer Transmission Divisions  
request for withdrawal of the T.S.D. Permit (E.P.A. I.D. #OHO 052  
813-840) for this plant. We would request that we still be  
classified as a small quantity generator and keep our E.P.A. I.D.

*LC, TSD, PA*  
All of the required analyses have been made and we feel that  
this plant does not fall under the T.S.D. definition.

Enclosed are lab reports which David L. Ferguson, Ohio E.P.A.  
and Bruce Syniewski, Fed. E.P.A. requested.

If you have any questions or need clarification, David  
Ferguson of the Ohio E.P.A. may be able to help or please contact  
me at (419) 470-8423.

Greg Schafer  
Maintenance Planner/Coordinator

CC: David L. Ferguson, O.E.P.A.  
Bruce Syniewski, Fed. E.P.A.  
Dean Couch  
Rudy Eskra  
Terry Drennan  
Jerry Hunt  
Jim Hyland

RECEIVED

OCT 23 1985

SOLID WASTE BRANCH  
U.S. EPA, REGION V

Dana Corporation - Spicer  
P.O. Box 986  
Toledo, OH 43696

ttn: G. Schafer



lab no. 85-3777

lot no. \_\_\_\_\_

p.o. no. \_\_\_\_\_

biological & environmental control laboratories, inc.  
615 front street toledo, ohio 43605 phone (419) 693-5307

sample  
description:

Water Discharge to Creek

procedure:

The sample was analyzed by procedures outlined in US EPA "Test Methods for Evaluating Solid Waste Physical/Chemical Methods" SW-846 July 1982 2nd Edition.

1,1,1 - Trichloroethane - was quantified by direct injection gas chromatography.

results:

Arsenic	less than 0.2 mg/L
Barium	less than 0.5 mg/L
Cadmium	less than 0.05 mg/L
Chromium	less than 0.1 mg/L
Lead	less than 0.1 mg/L
Mercury	less than 0.005 mg/L
Selenium	less than 0.05 mg/L
Silver	less than 0.05 mg/L
Total Cyanide	less than 0.1 mg/L
Total Solids	230 mg/L
Oil & Grease	1.2 mg/L
pH in S.U.	8.87
Phenols as $C_6H_5OH$	less than 0.1 mg/L
Total Suspended Solids	9 mg/L
Total Sulfide	0.80 mg/L
Flash Point	greater than 180°F
1,1,1 - Trichloroethane	less than 0.01%
Density	1.06
Water Content	100% by B, S & W

date completed 8/16/85 tech. CLL/TDO/JH approved by J E Huffman

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Dana Corporation - Spicer  
P.O. Box 986  
Toledo, OH 43696

ttn: G. Schafer



lab no. 85-3776  
lot no. \_\_\_\_\_  
p.o. no. \_\_\_\_\_

biological & environmental control laboratories, inc.  
615 front street toledo, ohio 43605 phone (419) 693-5307

sample  
description:

Effluent from "C" Tank

procedure:

The sample was analyzed by procedures outlined in US EPA "Test Methods for Evaluating Solid Waste Physical/Chemical Methods" SW-846 July 1982 2nd Edition.

1,1,1 - Trichloroethane - was quantified by direct injection gas chromatography.

results:

Arsenic	less than 0.2 mg/L
Barium	less than 0.5 mg/L
Cadmium	less than 0.01 mg/L
Chromium	less than 0.1 mg/L
Lead	less than 0.1 mg/L
Mercury	less than 0.005 mg/L
Selenium	less than 0.05 mg/L
Silver	less than 0.05 mg/L
Total Cyanide	0.22 mg/L
Total Solids	780 mg/L
Oil & Grease	15.2 mg/L
pH in S.U.	9.75
Phenols as $C_6H_5OH$	0.28 mg/L
Total Suspended Solids	53 mg/L
Total Sulfide	1.2 mg/L
Flash Point	greater than 180°F
1,1,1 - Trichloroethane	less than 0.01%
Density	1.03
Water Content	100% by B, S & W

date completed 8/16/85 tech. CLL/IDO/JH approved by J E Huffman

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Dana Corporation - Spicer  
P.O. Box 986  
Toledo, OH 43696

Attn: G. Schafer



lab no. 85-3772

lot no. \_\_\_\_\_

p.o. no. \_\_\_\_\_

Page 1 of 2

biological & environmental control laboratories, inc.  
615 front street toledo, ohio 43605 phone (419) 693-5307

sample  
description:

#3 Leach Bed Solids

analysis: Extraction Procedure Toxicity Testing

procedure: A composite sample of 108.89 grams was filtered resulting in a 43.42 gram filter cake and 54 ml of filtrate. The filter cake was extracted as outlined in "Test Methods for Evaluating Solid Wastes Physical/Chemical Methods". The sample was extracted in 695 ml of distilled water and a total of 174 ml of 0.5 N acetic acid was needed in order to maintain a specified pH of  $5.0 \pm 0.2$ . The extract was diluted with 0 additional ml of water and filtered through a 0.45 um pore size membrane filter. The extract and 54 ml of filtrate from the composite sample were combined and analyzed according to the above reference.

1,1,1-Trichloroethane - A portion of the sample was extracted in carbon disulfide and analyzed by gas chromatography for 1,1,1-Trichloroethane.

Oil, Solids & Water - A weighed portion of the sample was distilled in boiling toluene using a Soxhlet extractor equipped with a distilling receiver. Oil was measured by weighing the toluene soluble residue, water was determined as volume in the receiver and solids by difference.

The remainder of the parameters were determined as outlined in US EPA "Test Methods for Evaluating Solid Waste Physical/Chemical Methods", SW-846, July 1982, 2nd Edition.

results:

<u>Test</u>	<u>Allowable Maximum</u>	<u>Measured Concentration</u>
Arsenic	5.0	less than 0.2 mg/L
Barium	100	1.3 mg/L
Cadmium	1.0	less than 0.05 mg/L
Chromium	5.0	less than 0.1 mg/L
Lead	5.0	less than 0.1 mg/L
Mercury	0.2	less than 0.005 mg/L
Selenium	1.0	less than 0.05 mg/L
Silver	5.0	less than 0.05 mg/L
Total Cyanide		4.1 ppm
Total Solids		19.6%

date completed 8/20/85 tech. CLL/DDO/JH approved by J E Huffman

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Dana Corporation - Spicer  
P.O. Box 986  
Toledo, OH 43696

attn: G. Schafer



lab no. 85-3772

lot no. \_\_\_\_\_

p.o. no. \_\_\_\_\_

Page 2 of 2

biological & environmental control laboratories, inc.  
615 front street toledo, ohio 43605 phone (419) 693-5307

sample  
description:

#3 Leach Bed Solids

analysis:

Extraction Procedure Toxicity Testing

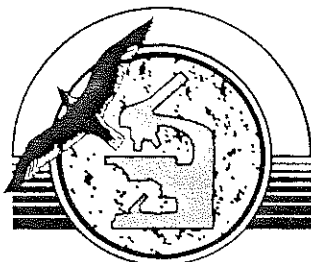
<u>Test</u>	<u>Allowable Maximum</u>	<u>Measured Concentration</u>
pH		9.78
Phenols as $C_6H_5OH$		1.7 ppm
Total Sulfide		254,000 mg/L
Flash Point		greater than 180°F
1,1,1-Trichloroethane		less than 0.01%
Density		1.06
Water Content		10.5%
Solids		79.1%
Oil		10.4%

date completed 8/20/85 tech. CLL/IDO/JH approved by J E Huffman

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Dana Corporation - Spicer  
P.O. Box 986  
Toledo, OH 43696

Attn: G. Schafer



lab no. 85-3774

lot no. \_\_\_\_\_

p.o. no. \_\_\_\_\_

biological & environmental control laboratories, inc.  
615 front street toledo, ohio 43605 phone (419) 693-5307

sample  
description:

#3 Leach Bed Liquid

procedure:

The sample was analyzed by procedures outlined in US EPA "Test Methods for Evaluating Solid Waste Physical/Chemical Methods" SW-846 July 1982 2nd Edition.

1,1,1 - Trichloroethane - was quantified by direct injection gas chromatography.

results:

Arsenic	less than 0.2 mg/L
Barium	less than 0.5 mg/L
Cadmium	less than 0.05 mg/L
Chromium	less than 0.1 mg/L
Lead	less than 0.1 mg/L
Mercury	less than 0.005 mg/L
Selenium	less than 0.05 mg/L
Silver	less than 0.05 mg/L
Total Cyanide	0.15 mg/L
Total Solids	1300 mg/L
Oil & Grease	12.9 mg/L
pH in S.U.	8.53
Phenols as C <sub>6</sub> H <sub>5</sub> OH	0.12 mg/L
Total Suspended Solids	470 mg/L
Total Sulfide	1.6 mg/L
Flash Point	greater than 180°F
1,1,1 - Trichloroethane	less than 0.01%
Density	1.05
Water Content	100% by B, S & W

date completed 8/16/85 tech. IDO/CLL/JH approved by J E Hoffman

All reports are submitted as confidential communications. Authorization for duplication in whole or part is reserved pending our written approval, as a mutual protection.

Dana Corporation - Spicer  
P.O. Box 986  
Toledo, OH 43696



lab no. 85-3771

lot no. \_\_\_\_\_

p.o. no. \_\_\_\_\_

Page 1 of 2

Attn: G. Schafer

biological & environmental control laboratories, inc.  
615 front street toledo, ohio 43605 phone (419) 693-5307

sample  
description:

#2 Leach Bed Solids

analysis:

Extraction Procedure Toxicity Testing

procedure:

A composite sample of 100.0 grams was filtered and extracted as outlined in Test Methods for Evaluating Solid Wastes Physical/Chemical Methods. The sample was extracted in 1600 ml of distilled water and a total of 400 ml of 0.5 N acetic acid was needed in order to maintain the specified pH of  $5.0 \pm 0.2$ . The extract was diluted with 0 additional ml of water and filtered through a 0.45 um pore size membrane filter. The filtrate was then analyzed according to the above reference.

1,1,1-Trichloroethane - A portion of the sample was extracted in carbon disulfide and analyzed by gas chromatography for 1,1,1-Trichloroethane.

Oil, Solids & Water - A weighed portion of the sample was distilled in boiling toluene using a Soxhlet extractor equipped with a distilling receiver. Oil was measured by weighing the toluene soluble residue, water was determined as volume in the receiver and solids by difference.

The remainder of the parameters were determined as outlined in US EPA "Test Methods for Evaluating Solid Waste Physical/Chemical Methods", SW-846, July 1982, 2nd Edition.

results:

<u>Test</u>	<u>Allowable Maximum</u>	<u>Measured Concentration</u>
Arsenic	5.0	less than 0.2 mg/L
Barium	100	1.2 mg/L
Cadmium	1.0	less than 0.05 mg/L
Chromium	5.0	less than 0.1 mg/L
Lead	5.0	less than 0.1 mg/L
Mercury	0.2	less than 0.005 mg/L
Selenium	1.0	less than 0.05 mg/L
Silver	5.0	less than 0.05 mg/L
Total Cyanide		5.6 ppm
Total Solids		42.0%

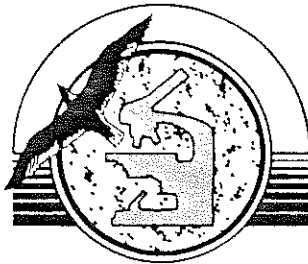
date completed 8/20/85 tech. CLL/IDO/JH approved by J E Huffman

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Dana Corporation - Spicer  
P.O. Box 986  
Toledo, OH 43696

Attn: G. Schafer



lab no. 85-3771

lot no. \_\_\_\_\_

p.o. no. \_\_\_\_\_

Page 2 of 2

biological & environmental control laboratories, inc.  
615 front street toledo, ohio 43605 phone (419) 693-5307

sample description: #2 Leach Bed Solids

analysis: Extraction Procedure Toxicity Testing

<u>Test</u>	<u>Allowable Maximum</u>	<u>Measured Concentration</u>
pH		8.95
Phenols as $C_6H_5OH$		3.3 ppm
Total Sulfide		46 ppm
Flash Point		greater than 180°F
1,1,1-Trichloroethane		less than 0.01%
Density		1.18
Water Content		29.2%
Solids		47.2%
Oil		23.6%

date completed 8/20/85 tech. CLL/DDO/JH approved by J E Huffman

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Dana Corporation - Spicer  
P.O. Box 986  
Toledo, OH 43696

Attn: G. Schafer



lab no. 85-3773

lot no. \_\_\_\_\_

p.o. no. \_\_\_\_\_

biological & environmental control laboratories, inc.  
615 front street toledo, ohio 43605 phone (419) 693-5307

sample  
description:

#2 Leach Bed Liquid

procedure:

The sample was analyzed by procedures outlined in US EPA "Test Methods for Evaluating Solid Waste Physical/Chemical Methods" SW-846 July 1982 2nd Edition.

1,1,1 - Trichloroethane - was quantified by direct injection gas chromatography.

results:

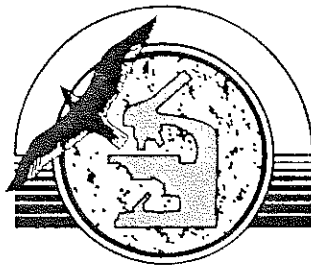
Arsenic	less than 0.2 mg/L
Barium	less than 0.5 mg/L
Cadmium	less than 0.05 mg/L
Chromium	less than 0.1 mg/L
Lead	less than 0.1 mg/L
Mercury	less than 0.005 mg/L
Selenium	less than 0.05 mg/L
Silver	less than 0.05 mg/L
Total Cyanide	0.28 mg/L
Total Solids	810 mg/L
Oil & Grease	32.6 mg/L
pH in S.U.	8.42
Phenols as C <sub>6</sub> H <sub>5</sub> OH	0.18 mg/L
Total Suspended Solids	17 mg/L
Total Sulfide	1.2 mg/L
Flash Point	greater than 180°F
1,1,1 - Trichloroethane	less than 0.01%
Density	1.06
Water Content	100% by B, S & W

date completed 8/16/85 tech. IDO/CLL/JH approved by J E Huffman

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Dana Corporation - Spicer  
P.O. Box 986  
Toledo, OH 43696

Attn: G. Schafer



lab no. 85-3775

lot no. \_\_\_\_\_

p.o. no. \_\_\_\_\_

biological & environmental control laboratories, inc.  
615 front street toledo, ohio 43605 phone (419) 693-5307

sample  
description:

Substance Entering "A" Tank

procedure:

The sample was analyzed by procedures outlined in US EPA "Test Methods for Evaluating Solid Waste Physical/Chemical Methods" SW-846 July 1982 2nd Edition.

1,1,1 - Trichloroethane - was quantified by direct injection gas chromatography.

results:

Arsenic	less than 0.2 mg/L
* Barium	less than 25 mg/L
Cadmium	less than 0.05 mg/L
Chromium	less than 0.12 mg/L
Lead	less than 0.1 mg/L
Mercury	less than 0.005 mg/L
Selenium	less than 0.05 mg/L
Silver	less than 0.05 mg/L
Total Cyanide	0.11 mg/L
Total Solids	670 mg/L
Oil & Grease	715 mg/L
pH in S.U.	7.13
Phenols as C <sub>6</sub> H <sub>5</sub> OH	0.37 mg/L
Total Suspended Solids	240 mg/L
Total Sulfide	2.0 mg/L
Flash Point	greater than 180°F
1,1,1 - Trichloroethane	less than 0.01%
Density	1.04
Water Content	100% by B, S & W

\* NOTE: Due to an interference in the sample, Barium limit is reported at a higher level

date completed 8/16/85 tech. IDO/CLL/JH approved by J E Huffman

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SPICER TRANSMISSION DIVISION

April 19, 1985

RECEIVED

APR 26 1985

SWD-AIS  
U.S. EPA, REGION V

Mr. Bruce Syniewski  
RCRA Activities  
Part B Application  
US EPA Permit Application  
P O Box A3587  
Chicago, Illinois 60690-3587

Subject: Phone Conversation

DHD 052813540 G, TSD, PA

Dear Mr. Syniewski,

In regard to our conversation of April 18, 1985 I have enclosed a copy of a letter sent to Mr. Karl K. Klepitsch. Let's review our conversation, since I'm not a Chemical Engineer, because I would like to check my facts. According to EPA we are required to fill out a Part B Application if we have a Part A permit. In order to drop these permits, we must prove that we generate less than 1000Kg of Hazardous waste per month, in order to be classified as a small quantity generator, but to be classified as such we must then apply for a new I.D. number as a small quantity generator.

NOT  
TRUE!

The areas of concern are the open top tanks that we have currently in our water treatment plant. The Leach Beds which return liquid back to treatment plant, and are used to sift out the lime and metals.

I had stated that I would contact our own Technical Center and Tom Carlisle of our intentions and gather any assistance needed from them.

I would like to thank you for your time and assistance, it was valuable and needed.

Sincerely yours,



**SPICER TRANSMISSION DIVISION**

January 28, 1985

Karl K. Klepitsch, Jr.  
RCRA Activities  
Part B Permit Application  
US. EPA Region V  
P O Box A3587  
Chicago, Illinois 60690-3587

Subject: Part B Application

Dear Mr. Klepitsch

In regard to your letter of Dec. 18, 1984, we have reviewed the Part B Application and grounds for requiring such a permit, and we feel that we don't need this permit. If we understand it correctly, by EPA Definitions we don't treat, store, or transport hazardous waste. We feel that the gentlemen who held this position before, filed for this permit as a protective measure, not knowing exactly what was required to obtain it.

In conclusion I feel as though we have no need for this permit and I would like to have our application withdrawn.

Thank you,

Gregory D. Schafer  
Jr. Project Engineer

GS/jm

APR 1 1985

5HS-13

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Paul Motyl, Plant Manager  
Dana Corporation  
Spicer Transmission Division  
P.O. Box 986  
Toledo, Ohio 43696

Re: Hazardous Waste Permit Application  
Part B Request  
OHD 052-813-540

Dear Mr. Motyl:

Previously you should have received an acknowledgment of our receipt of the Part A permit application material for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act (RCRA) permit program. Accordingly, this letter constitutes the next step in the formal process leading toward issuance or denial of a RCRA permit. Under the authority of 40 CFR 270.10, this is a formal request for submittal of Part B of the permit application for the above-referenced facility.

Also, this letter is to inform you that on November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (HSWA) were signed into law. This new law amends RCRA, and contains many provisions which may affect your facility. One important provision mandates that interim status for land disposal facilities shall terminate on November 8, 1985, unless the Part B permit application and a certification of compliance with the 40 CFR Part 265 Subpart F and H is submitted by November 8, 1985. Enclosed are copies of the HSWA provisions and a HSWA guidance document for selected issues related to permit applications for treatment, storage and disposal facilities.

Enclosed is a copy of 40 CFR 270 which lists the items required for submitting the Part B permit application for the facility (regulations promulgated prior to the enactment of HSWA). Five copies of the Part B application must be submitted and postmarked no later than November 1, 1985. Two copies of the application should be sent to the United States Environmental Protection Agency (U.S. EPA). Three copies of the application should be sent to the Ohio Environmental Protection Agency in Columbus. Please uniquely number each page of the application including all attachments (maps, specifications, etc.). A certification statement identical to the one states in 40 CFR 270.11(d)



must accompany each application and all additional submittals. Send your application to the following address:

RCRA ACTIVITIES  
Part B Permit Application  
U.S. EPA, Region V  
P.O. Box A3587  
Chicago, Illinois 60690-3587

We are committed to conducting the RCRA permitting process as efficiently as possible. Consequently, I suggest you contact Mr. Bruce Syniewski of my staff, at (312) 353-2197, as you begin preparing your application. Mr. Syniewski will be available to discuss specific needs of your application or to meet with you in Chicago. These efforts are intended to generate complete applications, without requiring any information beyond that which is necessary to make RCRA permit decisions.

Failure to furnish the complete Part B permit application by the above date, and to provide in full all required information, is grounds for termination of interim status under 40 CFR 270.10.

Information in the Part B permit application can be disclosed to the public, according to the Freedom of Information Act and U.S. EPA Freedom of Information regulations. If you wish, however, you may assert a claim of business confidentiality by printing the word "Confidential" on each page of the application which you believe contains confidential business information. All incoming materials containing confidential business information should be sent in a double envelope--one envelope inside the other. The inner envelope is to be addressed to the Docket Control Officer (DCO) with the following instructions: "To be opened only by the DCO."

U.S. EPA will review business confidentiality claims under regulations in 40 CFR Part 2, and may later request substantiation of such claims. Please review these rules carefully before making a claim. If you claim parts of your application as confidential, please provide us with a public information copy of the application. The public information copy must be identical to the full application with the exclusion of the confidential information.

We have enclosed a copy of 40 CFR Part 264, (regulations promulgated prior to the enactment of HSMA), which includes technical standards for the operation of treatment, storage, and disposal facilities. These standards will become applicable to your facility upon issuance of a RCRA permit by U.S. EPA. A copy of our "Guidance For Permit Application Preparation" and "Part B Completeness Checklist" are also enclosed. They will help you in preparing a comprehensive and complete permit application.

We will coordinate review of the application with the Ohio Environmental Protection Agency (OEPA) and will strive for the simultaneous issuance of Federal and State hazardous waste facility permits. It is possible that during the processing of the application, the State hazardous waste program may become authorized to issue RCRA permits for your type of facility. In that case, direct Federal processing will cease, and OEPA in lieu of U.S. EPA will make the final determination on your permit application.

Within 90 days after this formal request for Part B of the permit application for the facility, representatives from U.S. EPA and/or OEPA are planning to conduct a prepermit facility inspection. The inspection will be coordinated with you ahead of time, so that we can work together for a clear understanding of the permit application and compliance requirements. Your early familiarity with requirements of the Part B permit application will result in time savings for your facility and preparation of a higher quality application.

We look forward to working with you.

Sincerely yours,

Karl J. Klepitsch, Jr.  
Chief, Solid Waste Branch

Enclosures: 40 CFR 270 (applicable parts)  
40 CFR 264 (applicable parts)  
Guidance For Permit Application Preparation  
Part B Completeness Checklist  
Guidance on Early Enactment Provisions of NSMA  
Certification Regarding Potential Releases  
From Solid Waste Management Units

cc: Steve White, OEPA

bcc: Part A File  
Permit Contact

5HS-13:Ohio Unit:PG:3/28/85

INITIALS	TYPIST <i>9/28/85</i>	AUTHOR <i>BEH</i>	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WM CHIEF	WM CHIEF
DATE	<i>9/28/85</i>	<i>3/28/85</i>		<i>for</i> <i>Ken</i> <i>Steen</i> <i>3/28/85</i>		<i>Cur 3-29-85</i> <i>Wm</i> <i>3-29-85</i>	<i>Wm</i> <i>3/29/85</i>	<i>Wm</i> <i>3/29/85</i>





UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:  
5HW-13

Paul Motyl, Plant Manager  
Dana Corp.-Spicer Transmission Div  
P. O. Box 986  
Toledo, Ohio 43696

RE: Request for Information--Withdrawal of Part A  
FACILITY NAME: Dana Corp-Spicer Transmission Div  
U.S. EPA ID NO.: OHD052813540

Dear Mr. Motyl:

In a letter dated January 11, 1984, the United States Environmental Protection Agency Region V, requested you to submit additional information for withdrawal of your hazardous waste permit application. A response to our letter was due on March 11, 1984. Since we have not yet received the additional information requested, our records will continue to show the above facility as a regulated hazardous waste management facility subject to the Resource Conservation and Recovery Act, as amended (RCRA), and regulations promulgated thereunder.

Based on the information that was submitted, your facility appears to treat, store or dispose of a non-hazardous waste as defined in 40 CFR Part 262.11 (enclosed). Please review these requirements to verify that your facility qualifies as a non-hazardous waste handler. If it does, and a permit is not required, please submit your determination in writing, signed and certified by an authorized person in accordance with 40 CFR Part 270.11 (enclosed), requesting that your application be withdrawn. If at any time since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265 Subpart G (enclosed).

If your review indicates that a permit is required, but certain information on your application is incorrect, please submit a revised Part A with the appropriate changes to this Regional Office. We will assume your facility requires a permit, if no response is received in this office within 30 days. Accordingly, we will continue to process your application.

Please contact the Regulatory Analysis and Information Unit at (312) 886-6148 for assistance, if you have any questions. Please refer to "Request for Information--Withdrawal of Part A," in all correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief  
Waste Management Branch

Enclosures

cc: R. Eskra, Executive Vice President & Gen. Mgr.

JAN 11 1984

5HW-13

Paul Motyl, Plant Manager  
Dana Corporation  
Spicer Transmission Division  
P.O. Box 986  
Toledo, Ohio 43696

RE: Request for Information--Hazardous Waste  
Permit Review (Non-Hazardous Waste)

FACILITY NAME: Dana Corporation-Spicer Transmission  
Division

U.S. EPA ID #: OHD ~~052-813-546~~

540

Dear Mr. Motyl:

This letter serves to acknowledge that the United States Environmental Protection Agency (U.S. EPA) has processed your Part A Hazardous Waste Permit Application. Our review indicates your facility may not require a permit under §3006 of the Resource Conservation and Recovery Act as amended, (RCRA); however, further clarification is needed.

Based on the information submitted, your facility appears to treat, store or dispose of a non-hazardous waste. Wastes which exhibit characteristics of ignitability, corrosivity, reactivity, or EP toxicity, as defined in 40 CFR Part 261 Subpart C, or which are listed in 40 CFR Part 261 Subpart D, remain subject to regulation under RCRA.

Please reexamine your wastes pursuant to 40 CFR Part 262.11 (enclosed), and submit a revised Part A application to the Regional Office within 60 days, if your waste is hazardous and regulated. If you find that your waste is not regulated, please withdraw your permit application. Your written withdrawal request, with a detailed explanation, must be signed and certified by an authorized person, in accordance with 40 CFR Part 270.11 (enclosed). Withdrawal of the permit application will eliminate further mandated permit processing procedures. Unless we receive a reply within 60 days, we will assume that your waste is regulated, and that your facility is subject to the interim status standards, including the financial responsibility and Part B permit requirements.

Please contact the Technical, Permits, and Compliance Section at (312) 353-2197, for additional information and copies of blank Part A applications. Please refer to "Part A Application--Non-Hazardous Waste," in all telephone contacts and correspondence on this matter.

Sincerely yours,

Karl J. Kleptisch, Jr., Chief  
Waste Management Branch

Enclosures

cc: Max E. Snyder

R. Eskra, Executive Vice President and General Manager

5HW-13:RStrom:PGrace:1-6-84


INITIALS	TYPIST <i>PD</i> 1-6-84	AUTHOR <i>BLS</i> 1-6-84	STU #1 CHIEF	STU #2 CHIEF <i>WB</i> 1-6-84	STU #3 CHIEF	TPS CHIEF <i>Wojan</i> 1/9/84	WMB CHIEF <i>Acty</i> 1/11/84	WMD CHIEF
DATE								

*Qmm-1-9-83* *LS.*



Please print or type in the unshaded areas only  
(11- in areas are spaced for elite type, 12 characters/inch).

Form Approved OMB No. 153-S80004

FORM RCRA		U.S. ENVIRONMENTAL PROTECTION AGENCY <b>HAZARDOUS WASTE PERMIT APPLICATION</b> Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER F 0 H D 0 5 2 8 1 3 5 4 0
--------------	---	---	---

FOR OFFICIAL USE ONLY		COMMENTS
APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	
23	23 - 23 - 29	

## II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

### A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

YR.	MO.	DAY
8	6	6
73	73	73

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

☐ 2. NEW FACILITY (Complete item below.)

YR.	MO.	DAY
73	73	73

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

### B. REVISED APPLICATION (place an "X" below and complete item I above)

☒ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

## III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<b>Storage:</b>		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
<b>Disposal:</b>		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D30	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER
LAND APPLICATION	DB1	ACRES OR HECTARES
OCEAN DISPOSAL	DB2	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	DB3	GALLONS OR LITERS

### Treatment:

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C		DUP		1					
1 2		13 14 15		26 27 28					
LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	T 0 2	46,000 360,000	U		7				
2	S 0 4	321,000 12,800	G		8				
3	S 0 1	520	G		9				
4					10				



**III. PROCESSES (continued)**

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

**IV. DESCRIPTION OF HAZARDOUS WASTES**

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS.....	P
TONS.....	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS.....	K
METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

**D. PROCESSES****1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** — A facility will treat and dispose of an estimated 300 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO. / LINE	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	200	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA Form 3510-3 (6-80)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)												
S												T/R C
F												6
1	2	3	4	5	6	7	8	9	10	11	12	13

## V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

## VI. PHOTOGRAPHS

All existing facilities must include photographs (*aerial or ground-level*) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (*see instructions for more detail*).

## VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)				LONGITUDE (degrees, minutes, & seconds)			
41	42	00		83	33	00	
85 66	87 53	89 00		72 00	74 00	76 00	

## VIII. FACILITY OWNER


- ☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER															2. PHONE NO. (area code & no.)																					
C																																				
E																																				
13	14														53	54	55	56	57	58	59	60	61	62	63	64	65									
3. STREET OR P.O. BOX															4. CITY OR TOWN										5. ST.		6. ZIP CODE									
C																C																				
F																G																				
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51


## IX. OWNER CERTIFICATION

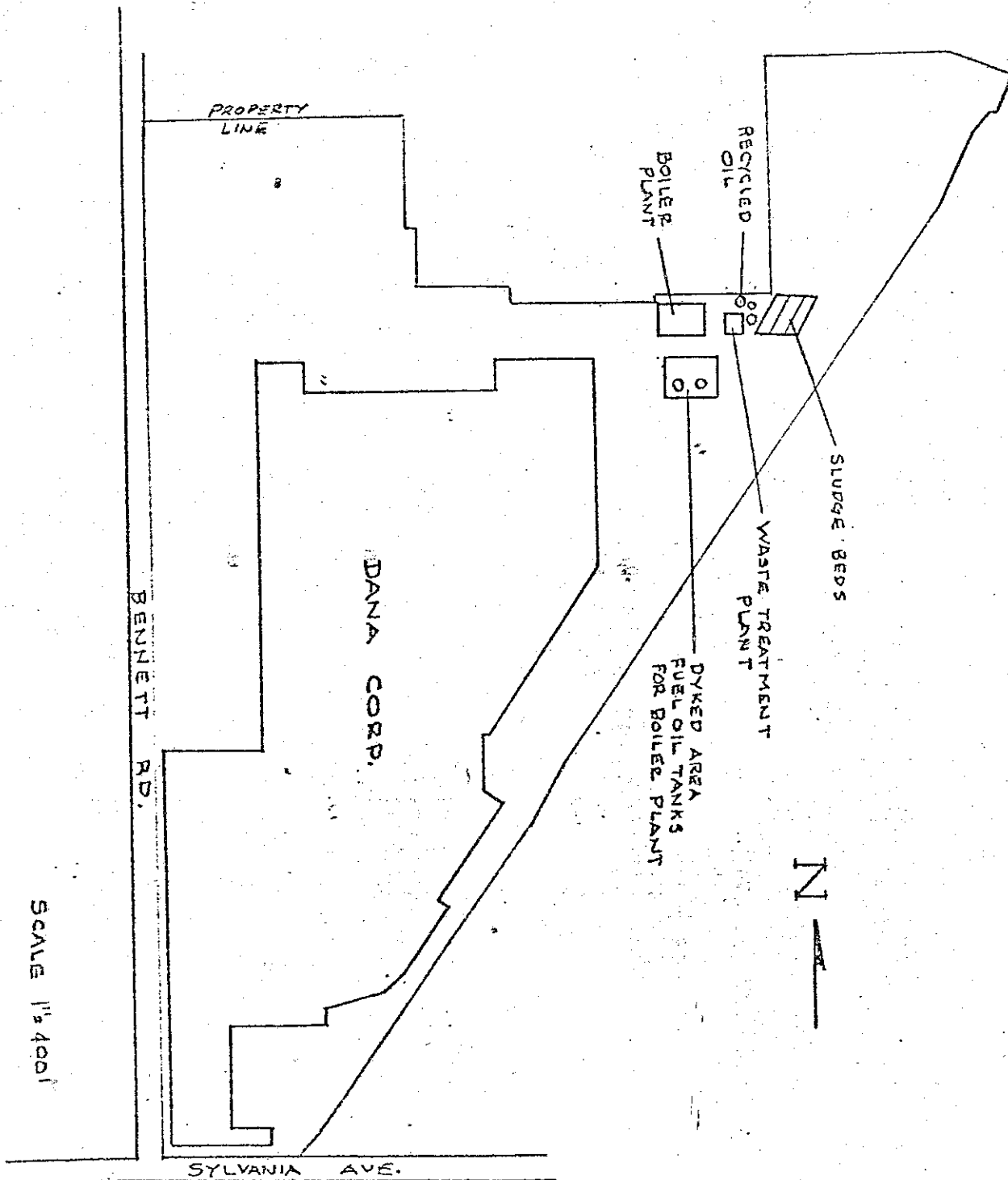
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

<p>A. NAME (print or type)</p> <p>Executive Vice-president and General Manager</p>	<p>B. SIGNATURE</p> 	<p>C. DATE SIGNED</p> <p>10-17-80</p>
--	---	---------------------------------------

## X. OPERATOR CERTIFICATION

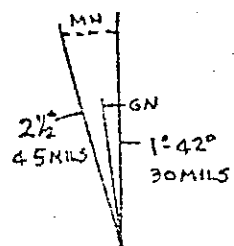
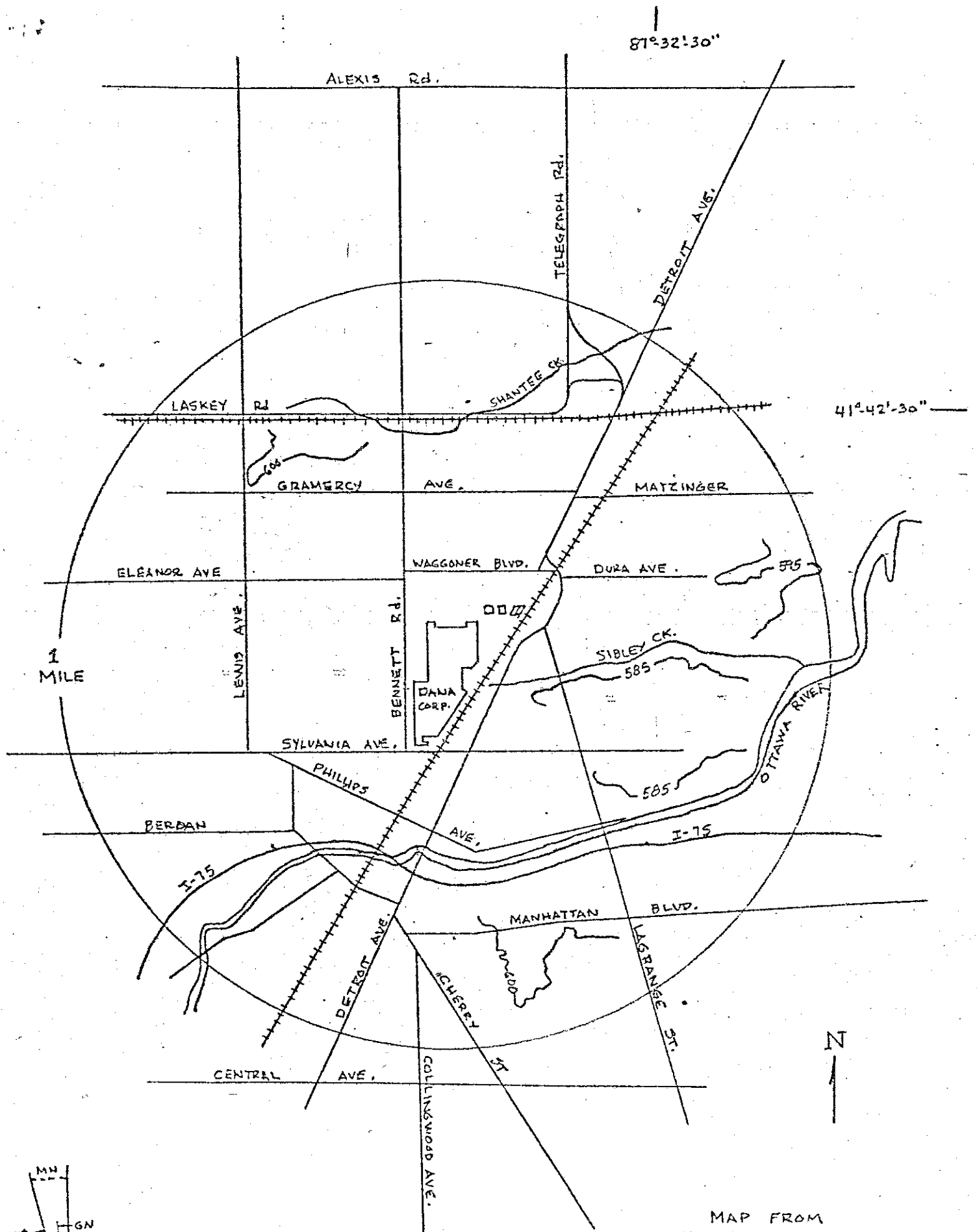
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Executive Vice-president and General Manager		10-17-80



SCALE 1" = 400'





UTM GRID 2 1965 MAGNETIC NORTH

MAP FROM  
U.S. GEOLOGICAL SURVEY  
TOLEDO, OHIO - MICH.  
N 4137.5 - W 8350 / 7.5  
1965  
AMS 4267 II NE SERIES V852  
USGS MAP TOLEDO, OHIO

File  
MAIL

SPICER TRANSMISSION  
DIVISION  
P.O. BOX 986  
TOLEDO, OHIO 43696



DANA CORPORATION

June 24, 1982

*Is this a  
change under  
interim status?*

*K. Homer  
6/29/82*

04005283540 g TSD PA

United States Environmental  
Protection Agency  
Region V  
230 South Dearborn St  
Chicago, IL 60604

RECEIVED

JUN 28 1982

WASTE MANAGEMENT BRANCH  
EPA, REGION V

Attn: Kathy Homer

This is to inform you that we are adding to our RCRA permit, Form 3, a new hazardous waste. Attached you will find a copy of our application that has been updated as well as the addition of Cyanide in Section IV. Except for the Cyanide the other changes came about in a conversation with Diane Parker on 8/19/81, in which changes were made in Section III & Section IV.

In Section III, Line 1, the change was from T02, 46,000 gal. cap. to T01, 360,000 gal. cap. This is our water treatment plant for soluble oil mixtures. Line 2, should have been 12,800 gal., which is our pond capacity for Floc. Line 3, is the addition of S01, 520 gal. for Chloroethane, which at that time I felt we would send outside, but have since cut out usage to only Degreasers and are using a non-hazardous solvent for other cleaning uses.

In Section IV, at the time of filing this permit, line 4, U-219 was expected to be present in some of our chemicals and coolants, but after extensive testing, none could be found. On line 6, 7 & 8 these processes were not used at the time of filing, but had been in the past. Therefore, not knowing what action to follow for sure, we listed them any way. But after talking to your office I was told to remove these and if at a later date we went back to them, we would have to add them back on.

On line 9, of Section IV, I have added the P030 Cyanide. This has shown up for the first time in a tank at our water treatment plant. We don't do cyaniding at this plant, so therefore, we don't know where this came from. An extensive search and testing is going on now to try and find where this is from.

RECEIVED  
7/07/82

The process codes S02 and S04 I have shown, are the other locations that this could be found after our testing is complete, so therefore, I have shown these process codes for future use if necessary.

If you should need any further information on the above material please contact me at (419) 470-8423.

Very truly yours,

*Max E. Snyder*

Max E. Snyder

/fm



<b>FORM 1</b> <b>GENERAL</b>		<b>U.S. ENVIRONMENTAL PROTECTION AGENCY</b> <b>GENERAL INFORMATION</b> <i>Consolidated Permits Program</i> (Read the "General Instructions" before starting.)		<b>I. EPA I.D. NUMBER</b> 04D0528135403	
<b>LABEL ITEMS</b>		<b>PLEASE PLACE LABEL IN THIS SPACE</b>		<b>GENERAL INSTRUCTIONS</b>	
I. EPA I.D. NUMBER				If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
III. FACILITY NAME					
V. FACILITY MAILING ADDRESS					
VI. FACILITY LOCATION					

**II. POLLUTANT CHARACTERISTICS**

**INSTRUCTIONS:** Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

**III. NAME OF FACILITY**

1 SKIP DANA CORP SPICER TRANSMISSION DIV.

**IV. FACILITY CONTACT**

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)	
2 PAUL MOTYL	PLANT MANAGER	419	476 8200

**V. FACILITY MAILING ADDRESS**

A. STREET OR P.O. BOX		B. CITY OR TOWN	C. STATE	D. ZIP CODE
3 PO BOX 986		TOLEDO	OH	43696

**VI. FACILITY LOCATION**

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
5 4100	BENNETT RD	LUCAS		TOLEDO	OH	43696	095



EPA Form 3510-3 (6-80)

589



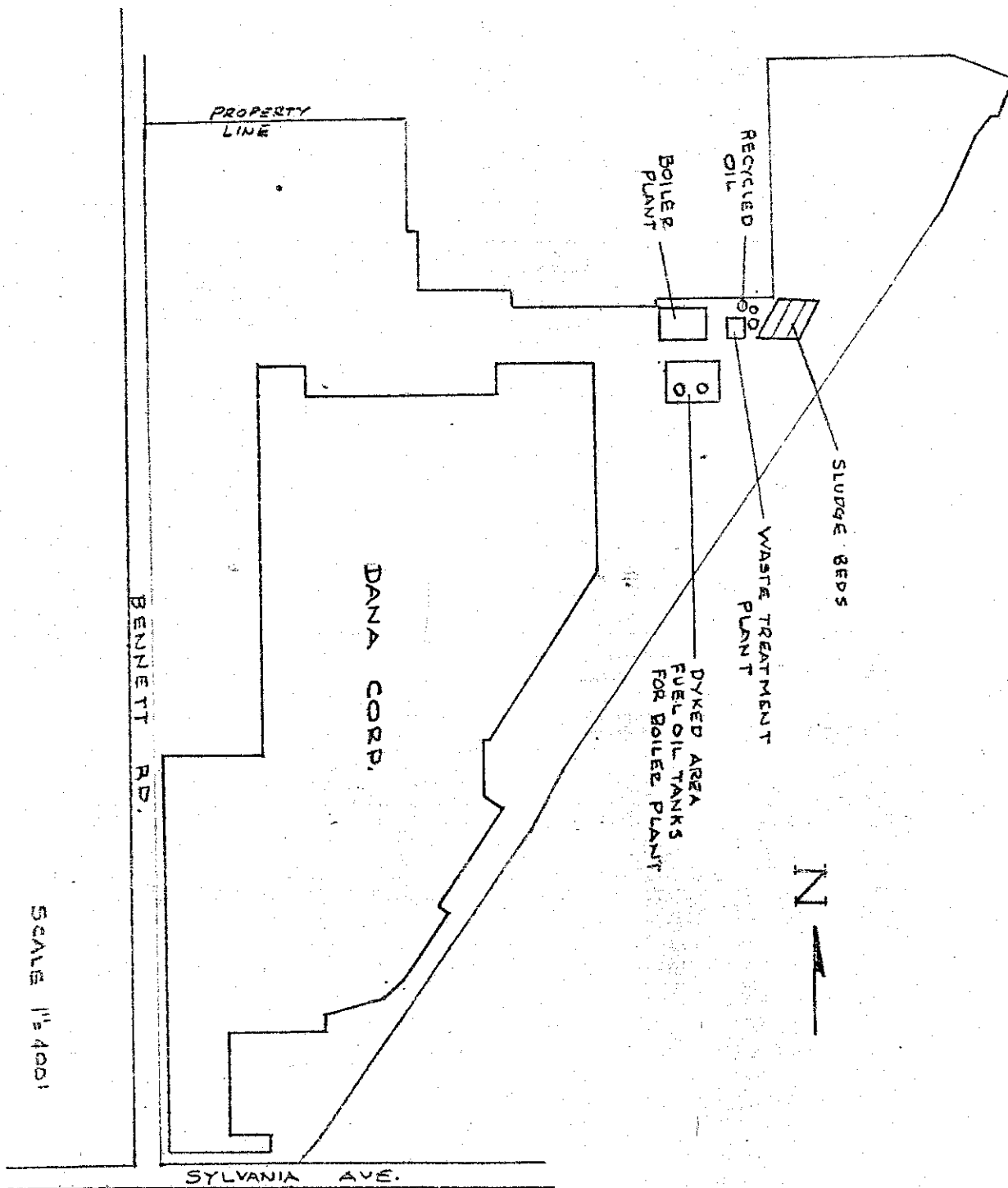
Continued from page 2.

NOTE: Photocopy this page before completion if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)															FOR OFFICIAL USE ONLY										
<div style="display: flex; justify-content: space-between;"> <div> <div style="border: 1px solid black; padding: 2px;">S</div> <div style="border: 1px solid black; padding: 2px;">W</div> </div> <div> <div style="border: 1px solid black; padding: 2px;">T/A</div> <div style="border: 1px solid black; padding: 2px;">C</div> </div> </div>															<div style="display: flex; justify-content: space-between;"> <div> <div style="border: 1px solid black; padding: 2px;">S</div> <div style="border: 1px solid black; padding: 2px;">W</div> </div> <div> <div style="border: 1px solid black; padding: 2px;">T/A</div> <div style="border: 1px solid black; padding: 2px;">C</div> </div> </div>										
<div style="display: flex; justify-content: space-between;"> <div> <div style="border: 1px solid black; padding: 2px;">1</div> <div style="border: 1px solid black; padding: 2px;">2</div> </div> <div> <div style="border: 1px solid black; padding: 2px;">13</div> <div style="border: 1px solid black; padding: 2px;">14</div> <div style="border: 1px solid black; padding: 2px;">15</div> </div> </div>															<div style="display: flex; justify-content: space-between;"> <div> <div style="border: 1px solid black; padding: 2px;">1</div> <div style="border: 1px solid black; padding: 2px;">2</div> </div> <div> <div style="border: 1px solid black; padding: 2px;">13</div> <div style="border: 1px solid black; padding: 2px;">14</div> <div style="border: 1px solid black; padding: 2px;">15</div> <div style="border: 1px solid black; padding: 2px;">23</div> <div style="border: 1px solid black; padding: 2px;">24</div> <div style="border: 1px solid black; padding: 2px;">25</div> <div style="border: 1px solid black; padding: 2px;">26</div> </div> </div>										
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																									
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))													
				27	28	29	27	28	29	27	28	29	27	28	29	27	28	29	27	28	29	27	28	29	27
1	U 2 2 6	30,000 000	P	S	0	1	T	0	1	S	0	4													
2	F 0 0 1											INC. IN ABOVE													
3	F 0 0 2											" " "													
4	U 2 1 9	15 000	P	T	0	2																			
5	U 1 8 8	15 000	P	S	0	4	T	0	1									000							
6	F 0 1 0	6000 000	P	S	0	2																			
7	F 0 1 1	500 000	P	S	0	2	D	8	0																
8	F 0 1 2	10 000	P	S	0	2																			
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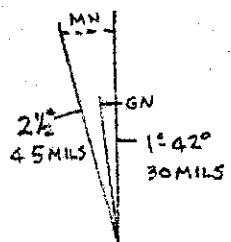
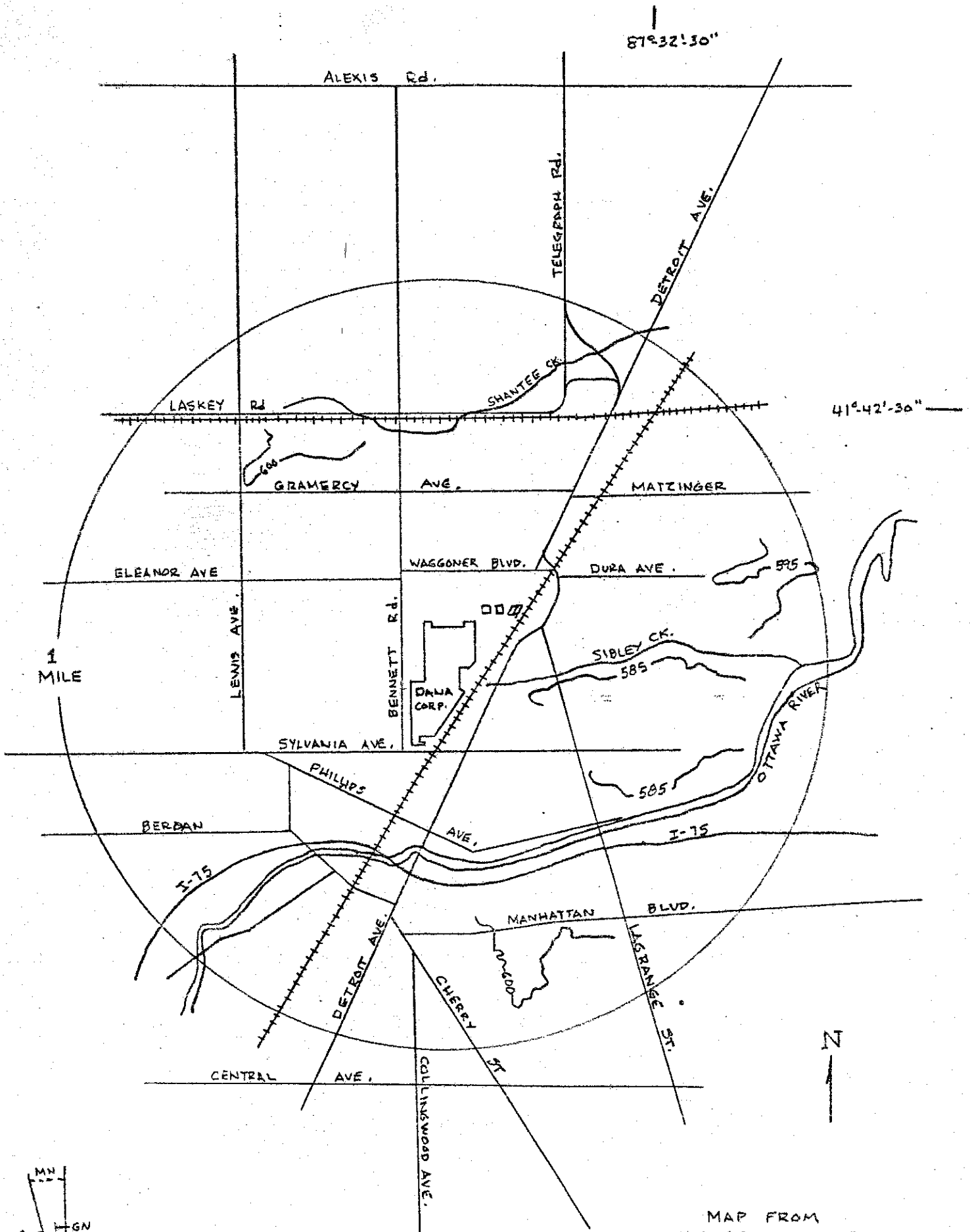




SCALE 1"=400'

V. FACILITY DRAWING (see page 4.)

SEE ATTACHED DRAWING



UTM GRID & 1965 MAGNETIC NORTH  
DECLINATION AT CENTER OF SHEET

MAP FROM  
U.S. GEOLOGICAL SURVEY  
TOLEDO, OHIO - MICH.  
N 4137.5 - W 8330 / 7.5  
1965  
AMS 4267 II NE SERIES V852  
USGS MAP TOLEDO, OHIO





**SPICER TRANSMISSION DIVISION**

February 21, 1989

Ms. Judy Stone  
U.S. EPA Region V  
RCRA Activities  
P.O. Box A-3587  
Chicago, IL 60690

Re: # 5HR-JCK-13, Your request, Dated January 29, 1990, for  
an Information Up Date, for the Facility located at  
4100 Bennett Rd., Toledo, Ohio

Dear Ms. Stone:

This is to inform you that The Dana Corporation officially  
Terminated operations at the 4100 Bennett Rd. facility in  
January, 1989.

Sincerely

Ken Lucitte  
Process Engineering Manager

cc: Phil Weis  
Carlos Gray  
Judi Copeland  
Mike Drake  
Jerry Hunt

RECEIVED

MAR 1 1990

U. S. EPA, REGION V  
SWB — PMS



**SPICER TRANSMISSION DIVISION**

February 10, 1986

Mr. Bruce Syniewski  
RCRA Activities  
U. S. EPA Permit Application  
P.O. Box A3587  
Chicago, Il. 60690-3587

**RECEIVED**

**FEB 18 1986**

**SWB - AIS  
U.S. EPA, REGION V**

Dear Mr. Syniewski;

In regard to all information you requested, we are unable to gather the appropriate people together to sign your request for status change. Therefore, we will be working with Dave Ferguson, O.E.P.A. in a closure plan. I am returning the status form, unsigned, along with potential releases and all analysis I have of the incidents.

Gregory D. Schafer  
Maintenance Planner/Coordinator

CC: Terry Drennan  
Jim Hyland  
David Ferguson, O.E.P.A.

GS/ic



CERTIFICATION REGARDING POTENTIAL RELEASES FROM  
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: DANA CORPORATION/SPICER TRANSMISSION DIV.  
U.S. EPA I.D. NUMBER: OH D 052 813 540  
LOCATION CITY: TOLEDO  
STATE: OHIO

1. Are there any of the following solid waste management units at your facility?

	<u>YES</u>	<u>NO</u>
• Landfill	<u>      </u>	<u>X</u>
• Surface Impoundment	<u>      </u>	<u>X</u>
• Land Farm	<u>      </u>	<u>X</u>
• Waste Pile	<u>      </u>	<u>X</u>
• Incinerator	<u>X</u>	<u>      </u>
• Storage Tank (Above Ground)	<u>      </u>	<u>X</u>
• Storage Tank (Underground)	<u>      </u>	<u>X</u>
• Container Storage Area	<u>X</u>	<u>      </u>
• Injection Wells	<u>      </u>	<u>X</u>
• Wastewater Treatment Units	<u>X</u>	<u>      </u>
• Transfer Stations	<u>      </u>	<u>X</u>
• Waste Recycling Operations	<u>      </u>	<u>X</u>
• Waste Treatment, Detoxification	<u>      </u>	<u>X</u>
• Other <u>                                </u>	<u>      </u>	<u>      </u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed on and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if available.

INCINERATOR: A Double Burn Incinerator is used to destroy out DAT

PLANT INFORMATION

STORAGE AREA: A 12' X 16' FENCED AREA WITH 6" WATERTIGHT

CURB FOR WASTE STORAGE UNFILL ANALYSIS HAS BEEN

WATER TREATMENT: 3 ABOVE GROUND TANKS TO SETTLE OUT NON-HAZARDOUS WATER

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR 261.

3. For the units noted in Number 1 above, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or still be occurring.

Please provide the following information:

- a. Date of release
- b. Type of waste or constituent released
- c. Quantity or volume of waste or constituent released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

SEE ATTACHED

4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

SEE ATTACHED

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

GREGORY D. SCHAFER MAINE. PLANNER/COORDINATOR  
Printed Name and Title

G. D. Schaffer  
Signature

2-8-86  
Date

SPILL PREVENTION CONTROL AND COUNTERMEASURE

WITH CONTINGENCY PLAN AND

EMERGENCY PROCEDURE FOR HAZARDOUS WASTE

NAME: DANA CORP.  
SPICER TRANSMISSION DIV.

DATE OF INITIAL OPERATION: 1929

TYPE OF FACILITY: MECHINING AND ASSEMBLING OF MEDIUM AND  
HEAVY DUTY TRUCK TRANSMISSION PARTS.

LOCATION: 4100 BENNETT RD.  
TOLEDO, OHIO 43612

OWNER: DANA CORP.  
4500 DORR ST.  
TOLEDO, OHIO 43697

DESIGNATED ON-SITE COORDINATOR: MIKE TSCHERNE

SPILL HISTORY:

1. On January 7, 1974 at approximately 8:00 AM, roughly 2500 gallons of #6 fuel oil was accidentally spilled into Sibley Creek through the storm sewer system. This was caused by human error, by not closing the proper valve in order to change a filter. The Toledo Pollution Control Board was notified along with Commercial Oil Services. Clean-up was completed and no damage was noted. The cost to Dana was approximately \$12,500.00.
2. On March 10, 1982 at approximately 10:00 AM, approximately 500 gallons consisting of a mixture of storm water run-off and treated coolant water was discharged to Sibley Creek.

The City of Toledo was notified @ 1:15 PM, The Ohio EPA @ Bowling Green @ 1:25 PM, The Ohio EPA @

SPILL HISTORY (CONT.)

Columbus @ 1:33 PM, and the U.S. Coast Guard @ 1:42 PM on March 10, 1982.

A sample of Sibley creek was taken to the lab for analyzing. No apparent damage was done, therefore, no clean-up was necessary.

A report in writting was submitted on April 1, 1982 to all agencies above.

5330 heatnerdowns blvd.  
toledo, ohio 43614  
phone (419) 866-5533

Dana Corporation  
P.O. Box 986  
Toledo, OH 43696

Attn: M. Snyder



lab no. 81-360

lot no. NA

p.o. no. T-291021

biological & environmental control laboratories, inc.

material(s): Oily Sand - Creek

analysis: Metal, Total Cyanide, Phenols, pH, Trichloroethylene

results: In ppm unless specified

Flashpoint - No flash at 140°F. Passes test for ignitability.

pH		7.07
Antimony	Less than	5
Arsenic		6
Beryllium	Less than	0.5
Cadmium	Less than	5
Chromium		88
Copper		140
Lead		120
Manganese		2.0%
Mercury		0.11
Nickel		220
Selenium	Less than	0.1
Silver		26
Thallium		10
Zinc		330
Trichloroethylene	Less than	2 - liquid portion only

completed 6/10/81

tech. DW/NH

approved by [Signature]



REQUEST FOR CHANGE IN STATUS TO:

"GENERATOR ACCUMULATING WASTE ON-SITE IN COMPLIANCE WITH 40 CFR 262.34"

(APPLICABLE TO FACILITIES WHICH, AS OF NOVEMBER 19, 1980, HAVE BEEN  
STORING WASTES IN CONTAINERS AND/OR TANKS ONLY)

Facility Name:
Facility Location:
Mailing Address:
U.S. EPA ID No.:

1. I certify, in reference to the above-named facility, that a complete and accurate description of the activities currently conducted, for purposes of the Resource Conservation and Recovery Act (RCRA), are those of a generator accumulating waste on-site, in compliance with 40 CFR 262.34. This description of activities shall be considered effective as of

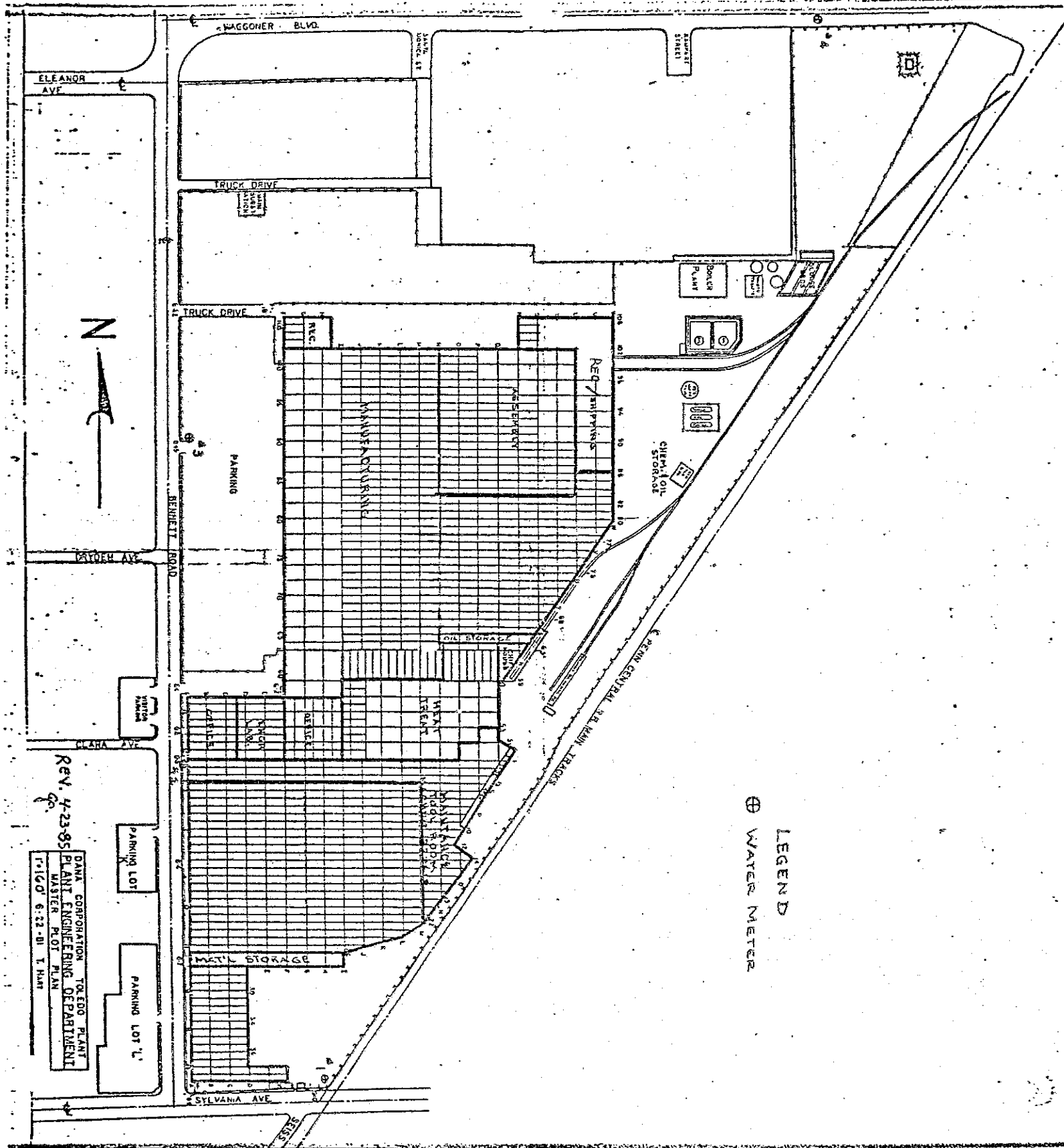
(please type, in above space: today's date,  
or other appropriate past date)

2. I certify that all hazardous waste which had been stored at this facility for greater than 90 days have been permanently removed, and -- for that portion of the wastes that were present on-site on or after November 19, 1980 -- the manifest requirements of 40 CFR Part 262 have been complied with, and all manifests are on file at this facility, available for inspection by authorized State and Federal officials.
3. I finally certify under penalty of law that I have personally examined, and am familiar with the information submitted in this document and all attachments, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.


\_\_\_\_\_  
Name and Title

\_\_\_\_\_  
Date

(Please have appropriate official, per 40 CFR 270.11, sign and date)





CORPORATE OFFICES

April 25, 1983

Environmental Protection Agency  
Region V/RCRA Activity  
230 S. Dearborn Street  
Chicago, Illinois 60604

Dear Sir:

Please find attached Dana Corporation's letter in support of its use of the financial test to demonstrate financial assurance. Similar letters have been sent to the respective state agencies.

Very truly yours,

A handwritten signature in cursive script that reads "Clement Revetti".

Clement Revetti  
Legal Counsel

cjl

Attachment

RECEIVED  
APR 27 1983  
WASTE MANAGEMENT  
BRANCH



CORPORATE OFFICES

Environmental Protection Agency  
Region V/PCRA Activity  
230 S. Dearborn Street  
Chicago, Illinois 60604

Dear Sir:

I am the chief financial officer of Dana Corporation, P.O. Box 1000, Toledo, Ohio 43697. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

A. Dana Corporation  
Weatherhead Division  
203 Weatherhead Street  
Angola, Indiana 46703  
ID#-IND 005 480 942  
Closure - \$126,000  
Post-closure -\$0-



DANA CORPORATION

- B. Dana Corporation  
Spicer Clutch Division  
Fifth and Brandon Streets  
Auburn, Indiana 46706  
ID#-IND 005-478-466  
Closure - \$200,000  
Post-closure - \$150,000
- C. Dana Corporation  
Weatherhead Division  
West Ellsworth Street  
P.O. Box 131  
Columbia City, Indiana 46725  
ID#-IND 000 804 781  
Closure - \$40,000  
Post-closure -\$0-
- D. Dana Corporation  
Victor Products Division  
Chicago Gasket Plant  
5750 West Roosevelt Road  
P.O. Box 1333  
Chicago, Illinois 60690  
ID#-ILD 068 469 368  
Closure - \$20,000  
Post-closure -\$0-
- E. Dana Corporation  
Weatherhead Division  
U.S. Route 24  
Antwerp, Ohio 45813  
ID#-OHD 005 039 730  
Closure - \$10,000  
Post-closure - \$84,000
- F. Dana Corporation  
Spicer Transmission Division  
4100 Bennett Road  
P.O. Box 986  
Toledo, Ohio 43696  
ID#-OHD 052 813 540  
Closure - \$35,000  
Post-closure -\$0-
- G. Dana Corporation  
Perfect Circle Division  
1900 Summit  
P.O. Box 2027  
Hastings, Nebraska 68901  
ID#-NED 091 998 567  
Closure - \$20,000





DANA CORPORATION

- H. Dana Corporation  
Spicer Axle Division  
Fort Wayne Plant  
2100 West State Blvd.  
P.O. Box 750  
Fort Wayne, Indiana 46801  
ID#-IND 005 470 885  
Closure - \$10,000  
Post-closure -\$0-
- I. Dana Corporation  
Boston Industrial Products  
P.O. Box 500  
Hohenwald, Tennessee 38462  
ID#-IND 004 045 605  
Closure - \$187,000  
Post-closure - \$200,000
- J. Dana Corporation  
Tyrone Hydraulics  
Corner of Fulton and Golding Drives  
P.O. Box 511  
Corinth, Mississippi 38834  
ID#-MSD 007 020 043  
Closure - \$5,000  
Post-closure - \$10,000

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None.

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the



following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: None.

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year ended December 31, 1982.

ALTERNATIVE II

1. Sum of current closure and post-closure cost estimates  
(total of all cost estimates shown in the four paragraphs  
above) ----- \$1,087,000
2. Current bond rating of most recent insurance of this  
firm and name of rating service ----- Moody's A2,  
S & P AA
3. Date of issuance of bond ----- June 15, 1981
4. Date of maturity of bond ----- June 15, 2006
5. Tangible net worth (if any portion of the closure and  
post-closure cost estimates is included in "total liabilities  
on your firm's financial statements, you may add the amount of  
that portion to this line) ----- \$913,000,000
6. Total assets in U.S. (required only if less than 90% of  
firm's assets are located in the U.S.) ----- \$1,578,000,000

- |  | Yes | No |
|--|-----|----|
| 7. Is line 5 at least \$10 Million?  | Yes |    |
| 8. Is line 5 at least 6 times line 1?  | Yes |    |
| 9. Are at least 90% of firm's assets located in<br>the U.S.? If not, complete line 10. |     | No |
| 10. Is line 6 at least 6 times line 1?   | Yes |    |



DANA CORPORATION

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.

Very truly yours,

DANA CORPORATION

By

Robert E. Byrket

Robert E. Byrket  
Vice President-Finance & Administration

April 18, 1983



INCUMBENCY CERTIFICATE

I, Sue Ann Griffin, Assistant Secretary of Dana Corporation, a Virginia corporation, do hereby certify that Robert E. Byrket, holds and continues to hold the chief financial officer position at Dana Corporation; namely, Vice President-Finance and Administration and Chief Financial Officer. I further certify that the signature set forth on the accompanying document is that of Robert E. Byrket.

(SEAL)

Sue Ann Griffin  
Assistant Secretary

Price  
Waterhouse

1600 NATIONAL BANK BUILDING  
601 MADISON AVENUE  
TOLEDO, OH 43604  
419 255-2760

April 20, 1983

Mr. Robert E. Byrket  
Chief Financial Officer  
Dana Corporation  
4500 Dorr Street  
Toledo, Ohio 43615

Dear Mr. Byrket:

We have examined the consolidated balance sheet of Dana Corporation and its Consolidated Subsidiaries as of December 31, 1982 and the related consolidated statements of income, of shareholders' equity and of changes in financial position for the year then ended. Our examination was made in accordance with generally accepted auditing standards and accordingly included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances. Our report thereon, which contains a qualification as to consistency, appears on page F-14 of Dana's Annual Report.

In connection with your letter to the Regional Administrator of the Environmental Protection Agency, we compared "Tangible net worth" of \$913 million (shareholders' equity of \$1,019 million less goodwill of \$106 million) indicated in item 5 and "Total assets in U.S." of \$1,578 million (which includes \$501 million of "Corporate assets") in item 6 to the corresponding amounts in the audited financial statements from which such amounts were derived and found such amounts to be in agreement.

Yours very truly,

Price Waterhouse



**CORPORATE OFFICES**

**Environmental Protection Agency**

Region V/RCRA Activity  
230 S. Dearborn Street  
Chicago, Illinois 60604

Environmental Protection Agency  
Region VII/RCRA Activity  
324 E. 11th Street  
Kansas City, Missouri 64106

Indiana State Board of Health  
Division of Land Pollution Control  
1330 W. Michigan Street  
P.O. Box 1964  
Indianapolis, Indiana 46206

Dear Sir:

I am the chief financial officer of Dana Corporation, P.O. Box 1000, Toledo, Ohio 43697. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

- A. Dana Corporation  
Weatherhead Division  
203 Weatherhead Street  
Angola, Indiana 46703  
ID#-IND 005 480 942  
Closure - \$126,000  
Post-closure -\$0-



DANA CORPORATION

- B. Dana Corporation  
Spicer Clutch Division  
Fifth and Brandon Streets  
Auburn, Indiana 46706  
ID#-IND 005-478-466  
Closure - \$200,000  
Post-closure - \$150,000
- C. Dana Corporation  
Weatherhead Division  
West Ellsworth Street  
P.O. Box 131  
Columbia City, Indiana 46725  
ID#-IND 000 804 781  
Closure - \$40,000  
Post-closure -\$0-
- D. Dana Corporation  
Victor Products Division  
Chicago Gasket Plant  
5750 West Roosevelt Road  
P.O. Box 1333  
Chicago, Illinois 60690  
ID#-ILD 068 469 368  
Closure - \$10,000  
Post-closure -\$0-
- E. Dana Corporation  
Weatherhead Division  
U.S. Route 24  
Antwerp, Ohio 45813  
ID#-OHD 005 039 730  
Closure - \$10,000  
Post-closure - \$84,000
- F. Dana Corporation  
Spicer Transmission Division  
4100 Bennett Road  
P.O. Box 986  
Toledo, Ohio 43696  
ID#-OHD 052 813 540  
Closure - \$35,000  
Post-closure -\$0-
- G. Dana Corporation  
Perfect Circle Division  
1900 Summit  
P.O. Box 2027  
Hastings, Nebraska 68901  
ID#-NED 091 998 567  
Closure - \$20,000  
Post-closure -\$0-



2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None.

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: None.

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.





DANA CORPORATION

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year ended December 31, 1981.

ALTERNATIVE II

1. Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above) ----- \$675,000
2. Current bond rating of most recent insurance of this firm and name of rating service ----- Moody's A2  
S & P AA-
3. Date of issuance of bond ----- June 15, 1981
4. Date of maturity of bond ----- June 15, 2006
5. Tangible net worth (if any portion of the closure and post-closure cost estimates is included in "total liabilities on your firm's financial statements, you may add the amount of that portion to this line) ----- \$895,000,000
6. Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.) ----- \$1,540,000,000



DANA CORPORATION

	Yes	No
7. Is line 5 at least \$10 Million?	Yes	
8. Is line 5 at least 6 times line 1?	Yes	
9. Are at least 90% of firm's assets located in the U.S.? If not, complete line 10.		No
10. Is line 6 at least 6 times line 1?	Yes	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.

Very truly yours,

DANA CORPORATION

By Robert E. Byrket

Robert E. Byrket

Vice President-Finance & Administration

July 6, 1982

INCUMBENCY CERTIFICATE

I, Sue Ann Griffin, Assistant Secretary of Dana Corporation, a Virginia corporation, do hereby certify that Robert E. Byrket, holds and continues to hold the chief financial officer position at Dana Corporation; namely, Vice President-Finance and Administration. I further certify that the signature set forth on the accompanying document is that of Robert E. Byrket.

(SEAL)

Sue Ann Griffin  
Assistant Secretary



1600 NATIONAL BANK BUILDING  
606 MADISON AVENUE  
TOLEDO, OH 43604  
419 255-2760

July 2, 1982

Mr. Robert E. Byrket  
Chief Financial Officer  
Dana Corporation  
4500 Dorr Street  
Toledo, Ohio 43615

Dear Mr. Byrket:

We have examined the consolidated balance sheet of Dana Corporation and its Consolidated Subsidiaries as of December 31, 1981 and the related consolidated statements of income, of shareholders' equity and of changes in financial position for the year then ended. Our examination was made in accordance with generally accepted auditing standards and accordingly included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances. Our report thereon, which contains a qualification as to consistency, appears on page F-14 of Dana's Annual Report.

In connection with your letter to the Regional Administrator of the Environmental Protection Agency, we compared "Tangible net worth" of \$895 million (shareholders' equity of \$1,003 million less goodwill of \$108 million) indicated in item 5 and "Total assets in U.S." of \$1,540 million (which includes \$509 million of "Corporate assets") in item 6 to the corresponding amounts in the audited financial statements from which such amounts were derived and found such amounts to be in agreement.

Yours very truly,

*Price Waterhouse*